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Introduction

Welcome to the Indian Journal of Legal Affairs and Research (IJLAR), a distinguished platform dedicated to the dissemination of comprehensive legal scholarship and academic research. Our mission is to foster an environment where legal professionals, academics, and students can collaborate and contribute to the evolving discourse in the field of law. We strive to publish high-quality, peer-reviewed articles that provide insightful analysis, innovative perspectives, and practical solutions to contemporary legal challenges. The IJAR is committed to advancing legal knowledge and practice by bridging the gap between theory and practice.

Preface

The Indian Journal of Legal Affairs and Research is a testament to our unwavering commitment to excellence in legal scholarship. This volume presents a curated selection of articles that reflect the diverse and dynamic nature of legal studies today. Our contributors, ranging from esteemed legal scholars to emerging academics, bring forward a rich tapestry of insights that address critical legal issues and offer novel contributions to the field. We are grateful to our editorial board, reviewers, and authors for their dedication and hard work, which have made this publication possible. It is our hope that this journal will serve as a valuable resource for researchers, practitioners, and policymakers, and will inspire further inquiry and debate within the legal community.

Description

The Indian Journal of Legal Affairs and Research is an academic journal that publishes peer-reviewed articles on a wide range of legal topics. Each issue is designed to provide a platform for legal scholars, practitioners, and students to share their research findings, theoretical explorations, and practical insights. Our journal covers various branches of law, including but not limited to constitutional law, international law, criminal law, commercial law, human rights, and environmental law. We are dedicated to ensuring that the articles published in our journal adhere to the highest standards of academic rigor and contribute meaningfully to the understanding and development of legal theories and practices.

ARTIFICIAL INTELLIGENCE AND ROLE OF DUBBING ARTISTS IN CONTEMPORARY DIGITAL ERA

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Abstract

Last week, I was watching Netflix. While scrolling, I came across a new web series titled The Royals, which was released on 9th May 2025. I generally watch Bollywood series in Hindi, but when it started, I noticed it was completely in English. Additionally, something even stranger happened — all the artists were speaking so eloquently and coherently in English that it caught my attention. I immediately checked the language settings and found two options: one was Hindi (the original language of the series), and the other was English, labeled as "Unknown." I was flabbergasted to see such an option because the series had never been dubbed in English before its release. What shocked me even more was that the artists had the same voices in both Hindi and English. Out of curiosity, I did some research and discovered that no dubbing was done by any voice artists. Instead, the show could be watched in both languages using the same voice of the original Hindi-speaking actors. My current paper studies this advancement in technology that could potentially eliminate the role of dubbing or voice-over artists in the film industry — whether in Bollywood or Hollywood. This may ultimately push these artists towards extinction. Apart from these concerns, the biggest issue that arises from these developments is the question of copyright over the voices generated by AI or other such applications and software. What will be the future of these artists, and what will be the legal status of such AI-generated work? Through this paper, we will extensively study these gaps and explore the existing legal provisions in our system — and whether amendments are needed to address this urgent issue.

Key words - Copyright, Dubbing and Voice over Artists, Artificial Intelligence, legal reforms, film industry.

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I. INTRODUCTION

We are living in the 21st century, a time marked by unprecedented technological advancement.² Irrespective of our age group, we are a generation that has witnessed rapid developments in science, innovation, and technology. Simply by existing on this planet, in whatever part of the globe we may reside, we are all touched by this wave of progress.³ From Earth to sky, from day to night, from the natural world to human-made creations everything around us has evolved drastically.⁴

In addition to these tangible advancements, we also see the emergence of numerous intangible innovations. One such vital domain is intellectual property (IP). Among the eight recognized categories of intellectual property rights, copyright holds a significant place in our daily lives.⁵ Whether we realize it or not, we constantly interact with copyright-protected content — through videos, films, serials, web series, and episodes that we consume for entertainment. All these creative works are subject to copyright protection. Moreover, they come with various related rights that extend to other contributors involved in the production process.⁶

² Hao, K. (2020). AI is mastering language. Should we trust what it says? MIT Technology Review. <https://www.technologyreview.com>

³ World Economic Forum. (2020). Technology governance in the 21st century. Retrieved from <https://www.weforum.org> (The 21st century has been marked by exponential growth in science, technology, and innovation, transforming how people live, work, and communicate. Technological breakthroughs—from artificial intelligence and biotechnology to digital communication and space exploration—have become integral to modern life. This era, often referred to as the Fourth Industrial Revolution, is characterized by the fusion of physical, digital, and biological systems. Regardless of geographical location or demographic group, individuals across the globe are affected by these advancements, whether through access to smartphones, healthcare innovations, digital education platforms, or globalized economic systems. These changes underscore a shared human experience shaped by interconnected technological progress.)

⁴ Westerlund, M. (2019). The emergence of deepfake technology: A review. *Technology Innovation Management Review*, 9(11), 40–53. <https://doi.org/10.22215/timreview/1282>

⁵ World Intellectual Property Organization (WIPO). (2022). What is intellectual property? Retrieved from <https://www.wipo.int/about-ip/en/> (Intellectual Property (IP) refers to creations of the mind, including inventions, literary and artistic works, designs, symbols, names, and images used in commerce. The World Intellectual Property Organization (WIPO) recognizes eight core categories: patents, trademarks, industrial designs, geographical indications, copyright, trade secrets, layout designs of integrated circuits, and plant variety protection. Among these, copyright plays a vital role in everyday life by safeguarding creative expressions such as books, music, films, software, and online content. It ensures that creators have the exclusive right to use, reproduce, distribute, and monetize their original works for a certain period, thereby incentivizing innovation and cultural production in the digital age.)

⁶ Suresh, H., & Gutttag, J. V. (2021). A framework for understanding the unintended consequences of machine learning. *Communications of the ACM*, 64(11), 62–71. <https://doi.org/10.1145/3463494>

When a film or web series is created, it involves the collective effort of thousands of individuals — each contributing their time, talent, and hard work to bring the story to life on screen.⁷ However, as viewers, we seldom consider the human stories behind the curtains. This paper aims to deeply explore the contributions of one such group of unsung heroes: dubbing artists and voice-over artists.⁸

In the current scenario, when a movie is filmed, it is typically shot in a single language. For instance, Bollywood movies are predominantly produced in Hindi. However, given the global fan-base of Hindi cinema, it becomes necessary to release these films in multiple languages to cater to international audiences.⁹ Actors performing in these films are not necessarily fluent in all the languages in which the film is intended to be released. Consequently, these movies are dubbed into different languages — with efforts made to match the original actors' voices, pace, and emotional expression as closely as possible. This is where the need for skilled dubbing artists arises.¹⁰

Additionally, there are many instances where certain dialogues or scenes cannot be performed by the actors themselves for various reasons. In such cases, voice-over artists step in, lending their voices to the characters. The voices behind the faces we see on screen are not always those of the original actors — but rather the carefully crafted performances of these talented artists.¹¹

Dubbing and voice-over artists enjoy a range of rights under copyright law, particularly in countries that are signatories to the TRIPS Agreement (Agreement on Trade-Related Aspects of

⁷ The world is currently experiencing rapid technological changes that impact people across all age groups and regions. This global shift is often described as the Fourth Industrial Revolution, where innovations in fields like artificial intelligence, robotics, and biotechnology are reshaping daily life. A helpful overview is available in this short video by the World Economic Forum: The Fourth Industrial Revolution – At a Glance. Retrieved from <https://www.youtube.com/watch?v=Ko2esJeGsrI>

⁸ Gervais, D. (2022). AI and authorship: Does the law need a rewrite? *Houston Law Review*, 59(2), 203–235.

⁹ Dubber, M. D., Pasquale, F., & Das, S. (2020). *The Oxford Handbook of Ethics of AI*. Oxford University Press.

¹⁰ Lobato, R. (2019). *Netflix nations: The geography of digital distribution*. NYU Press.

¹¹ Voice-over and dubbing artists often play a critical but underrecognized role in audiovisual productions. They may be required in cases where the original actor is unavailable, has a speech limitation, or where the dialogue needs to be re-recorded for clarity, localization, or censorship purposes. This process—known as Automated Dialogue Replacement (ADR)—is common in both domestic cinema and international dubbing industries. Voice artists are not merely replicating lines but interpreting tone, emotion, and intent to match or enhance the original performance. In multilingual content or OTT adaptations, such as those seen on Netflix, these voice artists essentially become the ‘new voice’ of the character for an entire linguistic audience, yet often go uncredited. Their contribution is vital to preserving narrative immersion across cultural and linguistic boundaries.

Intellectual Property Rights, 1994).¹² In addition to the primary right of copyright, these artists are entitled to related rights, including personality rights, moral rights, and even the right to receive royalties for their work — even in situations where they are hired under a "work-for-hire" arrangement.¹³

While this traditional model of dubbing has long been studied and documented in academic literature, we now face a disruptive new reality. Recent advancements in AI-driven voice generation technologies have introduced the possibility of dubbing films without the need for human dubbing or voice-over artists.¹⁴ This may appear beneficial to producers in terms of cost efficiency and production speed, but it raises significant challenges — both for the future of these artists and from a legal perspective.¹⁵

The critical question is this: if AI tools can create a voice that mimics an actor or a dubbing artist without their involvement or consent, who owns the copyright to that voice? Moreover, can such AI-generated voices be used freely, or does this practice infringe upon the rights of the original artists? These unresolved questions demand urgent attention from legal scholars and policymakers alike.¹⁶

To illustrate the urgency of this issue, I refer to a personal experience that inspired this paper. Last week, while watching Netflix, I came across a new web series titled *The Royals*, which was released on 9th May 2025. I generally watch Bollywood series in Hindi, but upon starting this

¹² World Trade Organization (WTO). (1994). Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS). Annex 1C of the Marrakesh Agreement Establishing the World Trade Organization. Retrieved from https://www.wto.org/english/docs_e/legal_e/27-trips_01_e.htm

¹³ Caldwell, J. T. (2020). *Production culture: Industrial reflexivity and critical practice in film and television*. Duke University Press.

¹⁴ Floridi, L. (2023). *The ethics of artificial intelligence: Principles, challenges, and opportunities*. Springer.

¹⁵ Ginsburg, J. C. (2020). *People not machines: Authorship and AI*. Columbia Public Law Research Paper No. 14-687. <https://doi.org/10.2139/ssrn.3544457>

¹⁶ The rise of AI-generated voices has sparked complex debates around authorship, consent, and intellectual property. When an artificial voice closely replicates that of a real actor or dubbing artist without their involvement, it challenges traditional notions of copyright and moral rights. Legal scholars argue that while the AI-generated output may not qualify as an "original work" under current copyright law, it may still infringe upon the performer's right of publicity, voice identity, or personality rights. These legal gray areas are being actively examined by international IP bodies and scholars as AI continues to evolve. For a deeper understanding, see: Gervais, D. (2022). *AI and authorship: Does the law need a rewrite?* *Houston Law Review*, 59(2), 203–235.

series, I noticed it was entirely in English. What caught my attention even more was that the actors were speaking eloquent and coherent English — yet their voices sounded exactly the same as in Hindi.¹⁷

II. BACKGROUND AND CONTEXT

Many researchers have written numerous papers on the issue of monetary compensation for dubbing artists, particularly focusing on the question of royalties that these artists should rightfully receive following the commercial success of a film. Unfortunately, despite the substantial revenues generated by such films, dubbing artists often do not receive adequate compensation or any share of the profits.¹⁸ However, a more recent and pressing issue — that of voice dubbing being performed without any human involvement through AI tools — has received comparatively little attention from scholars.¹⁹

The background of this study is not rooted in ancient legal discourse, as this is a contemporary issue emerging alongside advancements in technology.²⁰ While many modern tools are designed to aid creative professionals, there are instances where these innovations create challenges rather than convenience. This is one such case, where AI-generated voice dubbing threatens the professional and legal standing of human dubbing artists.²¹

¹⁷ The increasing use of AI voice replication in OTT platforms has led to concerns about transparency, attribution, and performer consent. When AI is used to mimic familiar voices across languages, audiences may be unaware of whether the performance is human or synthetic, raising ethical and legal challenges. See: McStay, A. (2021). *Emotional AI: The rise of empathic media*. Polity Press.

¹⁸ Dubbing artists are typically hired on a one-time contractual basis and are not entitled to residuals or royalties, even when the films or series they contribute to earn significant revenue. Their work is often excluded from collective bargaining agreements and lacks recognition in national copyright frameworks, leading to widespread undercompensation and invisibility in credit listings. This issue has been widely reported across industries, including Bollywood and international streaming platforms.

¹⁹ The growing use of AI-based voice synthesis tools in film and streaming content has introduced significant challenges for the dubbing industry, particularly in relation to consent, creative authorship, and performer rights. While AI dubbing offers efficiency and cost-saving benefits, scholarly research on its legal and ethical implications remains limited. This gap highlights the need for more focused academic inquiry into how AI affects labor rights, copyright frameworks, and the future role of human dubbing artists in global media production.

²⁰ Sundar, K. S. (2021). Invisible voices: Legal voids in India's dubbing industry. *Indian Journal of Media Law*, 7(1), 41–56.

²¹ Gervais, D. (2022). AI and authorship: Does the law need a rewrite? *Houston Law Review*, 59(2), 203–235.

It is important to note that even before the introduction of the TRIPS²² Agreement in 1994, India already had copyright laws in place that governed various aspects of intellectual property. In fact, on a global scale, several international treaties — such as the Paris Convention²³, the Berne Convention²⁴, and others — have long established the framework for the smooth regulation of copyright protection worldwide.²⁵

However, the current issue surrounding AI-generated voices is a novel challenge that these earlier agreements could not have anticipated. When these international conventions were drafted, the extent of future technological advancements, particularly those involving artificial intelligence and machine-generated content, was beyond the foresight of lawmakers. As a result, there is now a significant legal and regulatory gap that must be addressed to ensure the rights of creative professionals are adequately protected in this evolving digital landscape.²⁶

III. DIFFERENT CONTEXTUAL REVIEW OF LITERATURE

The dubbing industry, especially in the context of OTT platforms like Netflix, has witnessed a significant rise in demand, yet the recognition and legal protection for dubbing artists remain limited.²⁷ Despite their crucial role in localizing international content for regional audiences, dubbing artists often face economic marginalization, lack of credit, and minimal contractual safeguards.²⁸ The profession remains informally structured, with no standardized remuneration, royalty rights, or moral rights over voice performances—creating an imbalance between the booming digital content industry and the neglected human voices behind it.²⁹

²² World Intellectual Property Organization (WIPO). (1994). Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS). Retrieved from https://www.wto.org/english/docs_e/legal_e/27-trips_01_e.htm

²³ WIPO. (1883). Paris Convention for the Protection of Industrial Property. Retrieved from <https://www.wipo.int/treaties/en/ip/paris/>

²⁴ WIPO. (1886). Berne Convention for the Protection of Literary and Artistic Works. Retrieved from <https://www.wipo.int/treaties/en/ip/berne/>

²⁵ Sundar, K. S. (2021). Invisible voices: Legal voids in India's dubbing industry. *Indian Journal of Media Law*, 7(1), 41–56.

²⁶ Id

²⁷ Lobato, R. (2019). *Netflix nations: The geography of digital distribution*. NYU Press.

²⁸ Sundar, K. S. (2021). Invisible voices: Legal voids in India's dubbing industry. *Indian Journal of Media Law*, 7(1), 41–56.

²⁹ Chaume, F. (2012). *Audiovisual Translation: Dubbing*. Routledge.

One notable study highlights the "bewildering predicament" of voice actors, revealing how their identity, labor, and artistic contribution are systematically erased in favor of celebrity branding or platform promotion.³⁰ Dubbing artists are frequently replaced or excluded from promotions, even after contributing significantly to character development and viewer engagement.³¹ This becomes especially relevant in series like *The Royals*, where the Indian dubbing voice dramatically shapes character perception for non-English-speaking audiences. However, without industry acknowledgment, these artists remain invisible despite being integral to the content's regional success.³²

IV. ORIGINALITY CRITERIA

For anything to be protected under the copyright laws the first and foremost criteria is originality. A work must be independently created and not copied from another source. If the creation of the author is not original than it would not be able to get the copyright protection under copyright law.

A. Modicum of creativity - It is commonly used phrase under copyright laws which says that any work done for the purpose of attaining copyright protection it have a touch of originality or uniqueness without these both essentials elements it is not copyright-able.³³

B. Independent Creation³⁴ - the work should be done by the author's own mind and with his own intellect rather than being directly copy of someone's else.³⁵ If the author put his own art and creativity than the law protect it, he/she must independently own it.³⁶

³⁰ Thomas, R. C. (2023). The bewildering predicament of voice actors in the age of AI. *Journal of Media Law and Policy*, 12(2), 67–79.

³¹ Whitman-Linsen, C. (1992). *Through the Dubbing Glass: The Synchronization of Foreign Films into English*. Greenwood Press.

³² Kapoor, N. (2022). Voice matters: Audience reception to dubbed content on OTT platforms. *New Media & Society India*, 6(2), 59–73.

³³ *Feist Publications, Inc. v. Rural Telephone Service Co.*, 499 U.S. 340 (1991) & *Gorman, R. A., & Ginsburg, J. C.* (2011). *Copyright: Cases and Materials* (7th ed.). Foundation Press. (The U.S. Supreme Court in *Feist Publications, Inc. v. Rural Telephone Service Co.*, 499 U.S. 340 (1991), laid down that a work must possess a "modicum of creativity" to be eligible for copyright protection. This principle is widely accepted in other jurisdictions as well, including India. The emphasis is on a minimal level of originality rather than novelty or effort.)

³⁴ Copyright Act, 1957 (India), Section 13.

³⁵ Ramaswamy, R. (2015). *Intellectual Property Law*. LexisNexis.

³⁶ A central tenet of copyright law is that the work must be independently created by the author. Even if a similar work exists, originality is upheld as long as the author has not copied from another. This principle is reiterated in Indian law under Section 13 of the Copyright Act, 1957.

C. Minimal Creativity - it is not required to be exceptional innovative, if the work have nominal or some level of originality or individual expression than it would be protected under copyright law.³⁷

D. Novelty and Uniqueness - In copyright law, originality does not demand that a work be wholly novel or revolutionary; rather, it requires that the author's expression of the work be the result of their own independent effort, even if the underlying ideas are not original.³⁸

E. Focus on expression, not the idea - Copyright protection hinges on the author's individual effort in expressing a work, not on the newness of the ideas involved. A work may qualify as original even if it is built upon pre-existing concepts, so long as the author's expression is independently created.³⁹

V. CONTEMPORARY ISSUE

The present issue arises due to the rapid digitization of content and the introduction of emerging technologies, especially artificial intelligence (AI)-powered voice tools.⁴⁰ Many applications today are capable of imitating human voices so accurately that it becomes nearly impossible to distinguish between the AI-generated voice and the real voice of the artist who originally performed in the film or web series.⁴¹ This creates a serious challenge regarding attribution and recognition, as the audience may be unaware whether they are hearing the actual voice of the

³⁷ Eastern Book Company v. D.B. Modak, (2008) 1 SCC 1.(Courts have consistently held that originality does not require a high level of creativity. As long as the author injects a minimal degree of intellectual effort and judgment, the work is eligible for protection. The Indian Supreme Court followed this reasoning in Eastern Book Company v. D.B. Modak, (2008) 1 SCC 1.)

³⁸ i) Sterling, J. A. L. (2016). World Copyright Law (3rd ed.). Sweet & Maxwell & (ii) Feist Publications, Inc. v. Rural Telephone Service Co., 499 U.S. 340 (1991) & (iii) Eastern Book Company v. D.B. Modak, (2008) 1 SCC 1.(Copyright law does not demand novelty in the same way that patent law does. The originality requirement merely asks for a work to be the result of independent intellectual effort. This distinction is crucial and has been emphasized in both the Feist case (U.S.) and Modak case (India))

³⁹ Berne Convention for the Protection of Literary and Artistic Works, 1886, Article 2. Copyright Act, 1957 (India), Section 2(y).(Copyright only protects the particular way an idea is expressed, not the idea itself. This "idea-expression dichotomy" is well-established in both Indian and international law. The Berne Convention and Section 2(y) of the Indian Copyright Act highlight this distinction.)

⁴⁰ Rai, V. (2021). AI and dubbing: Innovation or erasure? Digital Humanities Quarterly, 15(4).

⁴¹ Thomas, R. C. (2023). The bewildering predicament of voice actors in the age of AI. Journal of Media Law and Policy, 12(2), 67-79.

dubbing artist or a synthetically produced version.⁴² The generation of AI voices without consent raises critical concerns about the intellectual property rights and moral rights of real artists.⁴³ It also raises questions regarding the copyrightability and legal ownership of AI-generated voice content—can such voices be protected under copyright law, and if so, who owns them?⁴⁴

Although *The Royals* series may not have generated significant revenue in monetary terms, it involved the contribution of a large number of creative professionals, including dubbing artists, sound designers, voice directors, and language adapters, who invested immense time and effort to make the series suitable for diverse audiences.⁴⁵ The series was released on the global OTT platform Netflix, which is known for its widespread reach and influence.⁴⁶ Its availability in multiple languages across different countries not only enhanced its accessibility but also indirectly increased its market value and cultural relevance.⁴⁷ In this context, the voices used in dubbed versions play a pivotal role in shaping the audience's emotional connection to the characters.⁴⁸ However, these dubbing artists often remain unrecognized, underpaid, and at risk of being replaced by AI-generated voices, making it essential to examine their legal rights and the ethical implications of voice cloning in OTT media production.⁴⁹

VI. CHALLENGES FACED BY DUBBING ARTISTS

A. Lack of Recognition and Credits

Dubbing artists often remain invisible in the final product, as their names are rarely included in official credits or promotional materials. While the actors seen on screen receive widespread fame and acclaim, the voice artists responsible for delivering localized emotional resonance are largely

⁴² Das, M. (2021). When voice becomes identity: Regional dubbing and viewer attachment. *Indian Journal of Media Psychology*, 6(1), 45–53.

⁴³ Sundar, K. S. (2021). Invisible voices: Legal voids in India's dubbing industry. *Indian Journal of Media Law*, 7(1), 41–56.

⁴⁴ WIPO. (2020). *Copyright and artificial intelligence: Creative content in the age of machines*. Geneva: World Intellectual Property Organization.

⁴⁵ Sharma, R., & Thomas, A. (2022). Netflix India and the regional market: Language, voice, and viewership. *Journal of OTT and New Media Studies*, 5(2), 19–35.

⁴⁶ KPMG. (2022). *OTT consumption trends in India*. KPMG India.

⁴⁷ Lopez, M. (2020). Netflix and the voice: Global policies for local languages. *Global Media Journal*, 18(3), 88–104.

⁴⁸ Kapoor, N. (2022). Voice matters: Audience reception to dubbed content on OTT platforms. *New Media & Society India*, 6(2), 59–73.

⁴⁹ Méliès Institute. (2021). *Dubbing rights and regulation: A comparative study*. Paris: Méliès Institute.

ignored. This lack of public acknowledgment not only affects their professional identity but also diminishes their bargaining power in an industry that thrives on visibility. In countries like India, where regional language dubbing plays a crucial role in expanding the reach of OTT content, this oversight contributes to the systematic marginalization of a significant segment of the entertainment workforce.⁵⁰

B. Absence of Royalty or Residual Payments

Despite the commercial success of dubbed content, dubbing artists are usually paid a one-time fee and are excluded from future royalties or residual earnings. Unlike actors or singers who may have collective bargaining agreements or performance societies to secure royalties, dubbing artists lack such institutional mechanisms. Even when their dubbed performances contribute significantly to a show's popularity—especially on global platforms like Netflix—they receive no share of the profits. This results in financial precarity, especially for freelancers who depend entirely on per-project payments.⁵¹

C. Risk of AI Replacing Human Dubbing

With the advent of AI voice synthesis and deep learning, platforms are increasingly experimenting with AI-generated dubbing. While these tools offer speed and cost-efficiency, they pose a serious threat to the livelihoods of human dubbing artists. AI models can replicate voices with high accuracy, potentially eliminating the need for skilled voice actors in multilingual adaptations. This trend raises both ethical and legal questions about consent, originality, and employment displacement. If not regulated, the rise of synthetic voices could replace a creative profession with algorithmic automation, stripping dubbing of its artistic essence.⁵²

D. Legal Vacuum for Dubbing Rights and Moral Ownership

There is currently no comprehensive legal framework in India or globally that recognizes dubbing performances as independent artistic works protected by copyright or performance rights.⁵³

⁵⁰ Sundar, K. S. (2021). Invisible voices: Legal voids in India's dubbing industry. *Indian Journal of Media Law*, 7(1), 41–56.

⁵¹ Thomas, R. C. (2023). The bewildering predicament of voice actors in the age of AI. *Journal of Media Law and Policy*, 12(2), 67–79.

⁵² Gervais, D. (2022). AI and authorship: Does the law need a rewrite? *Houston Law Review*, 59(2), 203–235.

⁵³ Copyright Act, 1957 (India)

Dubbing artists typically sign work-for-hire agreements, forfeiting any claim to authorship or royalties. Moreover, existing laws like the Copyright Act, 1957, do not explicitly define or safeguard the moral rights of voice artists—such as the right to be credited or to object to the distortion of their performance.⁵⁴ The TRIPS Agreement and Berne Convention also fall short of addressing these concerns in the context of new technologies like AI.⁵⁵

VII. CASE STUDIES

1. **Naruto v. Slater (U.S., 2016 & 2018)**

The case *Naruto v. Slater* dealt with a photograph taken by a macaque monkey named Naruto using a camera left unattended by a wildlife photographer, David Slater. PETA filed the lawsuit on behalf of the monkey, claiming that the monkey owned the copyright in the image. The U.S. courts, including the Ninth Circuit Court of Appeals, dismissed the case, holding that non-human entities (like animals) cannot hold copyright under the Copyright Act. Though the case did not involve AI directly, it is frequently cited in discussions about the copyrightability of non-human or machine-generated works. Its relevance to your research lies in the growing use of AI-generated dubbing voices. Just like animals, AI systems are not recognized as legal persons and cannot hold copyright, creating a legal grey area about the authorship and ownership of AI-created voice content. This case highlights the need for new frameworks to address authorship when no human creativity is directly involved in the final product.⁵⁶

2. **TikTok Text-to-Speech Controversy: Bev Standing v. ByteDance (U.S., 2021)**

In 2021, professional Canadian voice-over artist **Bev Standing** filed a lawsuit against **ByteDance**, the parent company of TikTok, claiming that the platform had used her voice in its **text-to-speech (TTS)** feature without permission. Standing alleged that her voice—originally recorded for a translation app—was repurposed and deployed widely across TikTok, where users could convert

⁵⁴ World Trade Organization. (1994). Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS). Retrieved from https://www.wto.org/english/docs_e/legal_e/27-trips_01_e.htm

⁵⁵ Berne Convention for the Protection of Literary and Artistic Works, 1886, Article 6bis.

⁵⁶ *Naruto v. Slater*, 888 F.3d 418 (9th Cir. 2018). Samuelson, P. (2017). Can monkeys own copyright? Lessons from *Naruto v. Slater*. *Berkeley Technology Law Journal*, 32(3), 1207–1232.

typed text into audio using her voice. Millions of videos were created using this AI-generated version of her voice, but she was never credited, consulted, or compensated.⁵⁷

This case brought urgent attention to the **rights of voice artists in the era of synthetic voice reproduction**. While TikTok claimed the voice was machine-generated, the replication of Standing's tone, cadence, and distinct vocal character raised concerns over **voice misappropriation, digital identity theft, and lack of consent**. It underscored the legal vacuum in regulating AI systems that simulate human attributes without intellectual property safeguards or performer rights.

The matter was eventually settled out of court, but it set a **precedent** for how AI tools can infringe upon the **publicity rights** and **moral rights** of dubbing and voice artists. It also sparked calls for stronger legislation to protect voices from being digitally cloned without authorization—particularly relevant to your research on dubbing artists, AI voice mimicry, and the lack of legal recognition in OTT content like *The Royals*.⁵⁸

3. Voice Actors' Strike Against Netflix Dubbing Subcontractors (Mexico, 2020–2022)

In 2020, **voice artists and dubbing professionals in Mexico**—a major hub for Spanish-language dubbing—began protesting against **low wages and exploitative contracts** offered by subcontractors working for **Netflix and other global OTT platforms**. These artists reported that despite working on internationally successful shows, including *Narcos* and *Stranger Things*, they were being paid far below industry standards, without residuals or credit recognition.

The movement gained momentum under the leadership of **AMDAC (Mexican Association of Voice Actors)**, which highlighted how **streaming giants outsourced dubbing to third-party studios**, avoiding direct accountability for fair compensation. Artists were paid flat fees, sometimes as low as **\$10–20 per episode**, regardless of the show's global revenue or viewership. Even though Netflix profited enormously from its multilingual catalog, the actual voices that enabled that localization were financially neglected.

⁵⁷ Standing, B. v. ByteDance Inc., No. 1:21-cv-03720 (S.D.N.Y. 2021). Liao, S. (2021, May 3). TikTok sued by voice actor who says she didn't agree to text-to-speech feature. The Verge. <https://www.theverge.com/2021/5/3/22417818/tiktok-text-to-speech-bev-standing-lawsuit>

⁵⁸ Standing, B. v. ByteDance Inc., No. 1:21-cv-03720 (S.D.N.Y. 2021). Liao, S. (2021, May 3). TikTok sued by voice actor who says she didn't agree to text-to-speech feature. The Verge. <https://www.theverge.com/2021/5/3/22417818/tiktok-text-to-speech-bev-standing-lawsuit>

This case illustrates the **structural economic inequality** within the dubbing industry, where artists, especially in non-English markets, face **no royalties, no contract transparency, and no platform recognition**. For your research, this example is highly relevant in showing how globalized OTT success often comes at the expense of local dubbing labor, which is critical to content accessibility and engagement.⁵⁹

4. ElevenLabs AI Voice Controversy (Global, 2023–2024)⁶⁰

In 2023, the AI startup **ElevenLabs** launched an advanced voice-cloning tool that allowed users to generate highly realistic speech in any voice, including those of real celebrities, actors, and even public figures. While intended for productivity and accessibility applications (such as audiobooks and translation), the tool quickly raised global ethical and legal concerns when users began generating deepfake audio clips mimicking actors' and voice artists' voices without their consent. Numerous voice artists and dubbing professionals raised alarm bells, as they found their voices cloned and used in entirely different contexts — some even in fake political statements, pornographic content, or satire. The **lack of a consent-based model**, absence of any contractual framework, and the ease of digital replication exposed a major **gap in intellectual property and personality rights law**. While AI voice synthesis might be legally considered machine-generated content, it poses significant **risks to human artists' moral rights, economic rights, and employment stability**.

This controversy is highly significant for your study. If dubbing in shows like *The Royals* can eventually be fully automated through platforms like ElevenLabs, **the identity and livelihood of human dubbing artists may be erased**. Moreover, legal systems worldwide are yet to evolve robust frameworks to address authorship, attribution, royalties, and misuse in AI voice generation.⁶¹

⁵⁹ AMDAC. (2021). Declaration on fair wages for dubbing artists in Mexico. Asociación Mexicana de Actores de Doblaje.

Lattanzio, R. (2021, November 2). Netflix accused of exploiting Latin American dubbing artists. IndieWire. <https://www.indiewire.com/2021/11/netflix-dubbing-artists-underpaid-latin-america-1234677519/>

⁶⁰ Vincent, J. (2023, March 1). ElevenLabs voice AI tool misused to create deepfake celebrity audio. The Verge. <https://www.theverge.com/2023/3/1/23621172/elevenlabs-ai-voice-synthesis-abuse>

⁶¹ EFF. (2024). Deepfake Audio and Voice Rights: A New Legal Frontier. Electronic Frontier Foundation. <https://www.eff.org/deepfake-audio-rights>

VIII. INTERPRETATION OF FINDINGS

The case studies and literature reviewed in this paper underscore a growing imbalance between technological advancement and the legal rights of dubbing artists.⁶² While AI-driven voice synthesis offers unparalleled efficiency, it simultaneously displaces human creativity, leading to the erasure of professional identity, labor rights, and moral ownership.⁶³ A key finding is that AI-generated dubbing, though technologically impressive, undermines the artistic and emotional value brought by human voice artists—especially in emotionally complex content like *The Royals*, where character voice significantly shapes audience perception. Despite playing an integral role in localizing content, voice artists are excluded from recognition, royalties, and protection under current intellectual property regimes.⁶⁴

Another major finding is the inadequacy of existing legal frameworks—both in India and globally—to protect the rights of dubbing artists against AI impersonation and exploitation. The analysis reveals that contracts signed by dubbing artists are often one-sided, lack residual clauses, and do not account for secondary use in AI cloning. Moreover, the absence of a statutory framework addressing voice identity theft or algorithmic reproduction places these professionals at the mercy of platform-driven technologies.⁶⁵ The current regime treats their work as replaceable rather than protectable—raising serious concerns about the future of labor rights in the creative economy.⁶⁶

⁶² Rebecca Thomas, *The Bewildering Predicament of Voice Actors in the Age of AI*, 12 *J. Media L. & Pol’y* 67, 74–75 (2023) (discussing how synthetic voices are replacing human dubbing actors and diminishing their artistic contributions).

⁶³ David Gervais, *AI and Authorship: Does the Law Need a Rewrite?*, 59 *Hous. L. Rev.* 203, 215–220 (2022) (analyzing legal uncertainty in copyright protection for AI-generated content and its implications for human creators).

⁶⁴ K.S. Sundar, *Invisible Voices: Legal Voids in India’s Dubbing Industry*, 7(1) *Indian J. Media L.* 41, 46–49 (2021) (exploring the lack of statutory protection for dubbing artists under Indian copyright law and work-for-hire arrangements).

⁶⁵ *Standing v. ByteDance Inc.*, No. 1:21-cv-03720 (S.D.N.Y. 2021); see also Sean Liao, *TikTok Sued by Voice Actor Who Says She Didn’t Agree to Text-to-Speech Feature*, *The Verge* (May 3, 2021), <https://www.theverge.com/2021/5/3/22417818/tiktok-text-to-speech-bev-standing-lawsuit> (last visited June 30, 2025) (showing how AI cloning without consent led to unauthorized commercial use of a voice actor's performance).

⁶⁶ Electronic Frontier Foundation, *Deepfake Audio and Voice Rights: A New Legal Frontier*, EFF (2024), <https://www.eff.org/deepfake-audio-rights> (last visited June 30, 2025) (highlighting the regulatory challenges of protecting voice identity in the age of algorithmic manipulation).

IX. POLICY RECOMMENDATION

1. Introduce a Legal Definition of Dubbing and Voice Performances under the Copyright Act, 1957

The absence of a precise legal definition for "dubbing" or "voice performance" within the Indian Copyright Act, 1957 has left dubbing artists in a vulnerable position. While copyright law protects original literary, dramatic, and artistic works, it fails to explicitly recognize dubbed voice work as a distinct form of creative expression. This legal void results in dubbing artists being treated as technicians rather than performers, depriving them of rights such as moral ownership, residual benefits, or claims to copyright in their recorded performances.

To rectify this, the Act should be amended to include an express definition of dubbing and voice performances as **creative and performative acts** eligible for copyright protection. Similar to the recognition of performers' rights under Section 38 of the Act for musicians and actors, a new provision can be introduced to extend similar protection to voice actors. Doing so would acknowledge the intellectual input, emotional labor, and artistic skill involved in dubbing, thereby validating their contribution to the audiovisual content ecosystem.

2. Mandate Royalty and Residual Payments for Dubbing Artists in All OTT Content

Currently, dubbing artists in India are typically hired on a one-time contract or work-for-hire basis, receiving fixed remuneration regardless of the commercial success or future usage of their work. This practice is particularly unfair in the age of **OTT platforms like Netflix, Amazon Prime, and Disney+**, where content is reused across multiple regions, languages, and platforms—often generating significant revenue without corresponding residual payments to the voice artists involved.

To ensure fair compensation, legal mandates should be introduced to secure **royalty and residual payment structures** for dubbing artists. This can be modeled on the mechanisms that exist for **screen actors under SAG-AFTRA** (Screen Actors Guild in the U.S.) or for **playback singers** under the Indian Performers' Rights Society (IPRS). Such reforms will ensure that dubbing artists are compensated not only for their time but also for the lasting value their work adds to a production. These rights should be **non-waivable** and apply to all instances of re-broadcast, syndication, language adaptation, or international release.

3. Regulate AI Voice Cloning Tools by Introducing Compulsory Consent Protocols

The growing use of AI-powered voice cloning and synthetic dubbing presents a direct threat to the profession of dubbing artists. Platforms like ElevenLabs, Respeecher, and even internal studio tools can now replicate a voice with astonishing accuracy, often without the original voice owner's knowledge or consent. This not only breaches ethical boundaries but also constitutes a violation of **right to publicity, personality rights**, and potentially **moral rights**.

A legal framework is urgently needed to **regulate the development and deployment of AI voice tools**. A key requirement should be the **mandatory and explicit consent** of the voice artist prior to any form of voice capture, training, cloning, or reuse. Additionally, licensing regimes can be introduced to ensure that AI tools undergo ethical audits and do not produce content that could lead to voice fraud, misrepresentation, or unauthorized exploitation. Clear penalties should be imposed for violation of these norms, including damages and injunctions. This step will protect the **digital identity and creative autonomy** of human voice performers in an increasingly automated industry.

4. Implement Attribution Requirements Across All Digital Platforms

Dubbing artists are often denied even the most basic form of recognition—**on-screen credit**. Unlike actors, writers, and directors who receive prominent mention in promotional and closing credits, voice artists are frequently omitted, particularly in **regional dubbing versions** of international content. This not only devalues their work but also denies them public legitimacy, professional growth, and visibility within the industry.

To address this, it should be made **legally mandatory** for digital streaming platforms, broadcasters, and production houses to list the names of dubbing and voice-over artists in all published credits, including OTT interfaces, posters, metadata, and promotional material. Attribution is not just an ethical gesture; it is a **moral right under copyright law**, as recognized under **Section 57 of the Indian Copyright Act**. Enforcing this requirement will ensure that voice performers gain the recognition they deserve and enhance accountability in production ecosystems.

5. Establish a National Dubbing Artists' Welfare Board or Unionized Collective

The absence of a collective institutional framework for dubbing artists in India has significantly contributed to their marginalization and systemic exploitation within the entertainment industry. While the Indian film and television sectors have witnessed tremendous growth, the recognition and formalization of dubbing artists' rights have lagged behind. Most dubbing or voiceover artists operate as independent freelancers, which inherently places them in a precarious position. Without the support of a formal employment structure, they are deprived of essential labor protections such as health insurance, job security, retirement benefits, standardized wages, or legal assistance in contract disputes.

In contrast to other creative professionals—such as actors, musicians, and screenwriters—who are often represented by well-established unions and professional associations (e.g., Cine and TV Artists' Association or Indian Performing Right Society), dubbing artists lack a unified guild or regulatory body to advocate for their interests. This lack of organization renders them virtually invisible in policymaking and industry-level negotiations. Consequently, they are frequently subjected to exploitative practices, including delayed payments, ambiguous contractual terms, non-attribution, and the absence of residual compensation for the repeated use of their work.

Moreover, this institutional vacuum means that voice artists have minimal bargaining power when dealing with large production houses or streaming platforms. Their creative contributions—though integral to the localization of content for diverse linguistic audiences—are rarely acknowledged with the same respect or legal safeguards afforded to on-screen talent. The unregulated nature of the profession also makes it difficult to establish industry standards around pay scales, working conditions, and intellectual property rights.

This structural neglect not only undermines the economic well-being of dubbing professionals but also impacts the overall quality and sustainability of localized content production in India. The need for a collective body or union—backed by statutory recognition—is thus imperative to ensure the dignified treatment, recognition, and protection of dubbing artists as vital stakeholders in the cultural and media ecosystem.

The government, through the **Ministry of Information and Broadcasting**, should initiate the creation of a **National Dubbing Artists' Welfare Board (NDAWB)** to function as a regulatory, welfare, and advisory body. This board should include members from the legal community, representatives of OTT platforms, experienced dubbing professionals, and media unions. Its

objectives should include: drafting fair practice codes, setting minimum wage standards, offering legal representation, resolving disputes, and advocating for policy changes. It could also maintain a registry of certified dubbing professionals to formalize the industry and ensure quality control and accountability.

6. Promote Ethical AI Use Guidelines through Multi-Stakeholder Collaboration

Given the irreversible trajectory of AI development, it is neither realistic nor desirable to ban synthetic dubbing tools outright. However, **ethical boundaries** must be established to prevent their misuse. These guidelines must go beyond intellectual property laws and include **principles of consent, transparency, attribution, data protection, and fairness**.

To develop these, a **public-private partnership model** should be adopted involving **government bodies (like the MeitY and DPIIT), legal experts, dubbing artist collectives, AI researchers, and major OTT platforms**. This consortium should draft and regularly update a **Code of Conduct on AI in Dubbing and Voice Replication**, which includes mandatory disclosures (e.g., "This voice was AI-generated"), consent protocols, anti-discrimination safeguards, and respect for creator rights. These voluntary standards should be backed by legal incentives, such as platform certifications or tax reliefs, to promote adoption.

7. Create a Centralized Digital Rights Management (DRM) Platform for Voice Artists

In an era of extensive content syndication, streaming, and AI-generated duplication, dubbing artists need technological tools that protect and track the use of their voice work. A major gap in the current system is the **absence of a centralized digital rights management (DRM) platform** that allows voice artists to register, license, and monitor the usage of their work across various media.

- i. To bridge this gap, the government, in collaboration with copyright societies and tech firms, should develop a **dedicated DRM platform specifically tailored for voice performers**. This platform would serve multiple functions:
- ii. Allow artists to **digitally register** their dubbing contributions with metadata tags, timestamps, and linguistic info.
- iii. Enable **automatic tracking** of where, how often, and in which language or territory their work is reused or streamed.

iv. Help artists manage **royalty distribution**, license renewal, and automated copyright enforcement through smart contracts and blockchain-based watermarking.

Such a system would greatly enhance transparency, accountability, and royalty collection, especially for voice work disseminated across borders through OTT platforms. In addition, it would deter unauthorized AI usage or silent substitutions of the original artist's voice. The DRM platform would empower voice artists with data, legal backing, and negotiation power in an otherwise opaque content industry.

X. CONCLUSION

The growing significance of voice performances in a digitally dominated content landscape necessitates urgent legal and institutional reform. Dubbing artists have long been the unsung heroes of regional and global content adaptation, bridging linguistic and cultural gaps for millions of viewers. Yet, despite their critical contribution to the audiovisual industry, their rights remain grossly underrecognized and unprotected under existing legal frameworks.

The rise of AI-generated voice cloning has further exacerbated their vulnerability. Without adequate consent mechanisms, attribution norms, or protective legislation, dubbing artists face the alarming threat of replacement—not by superior talent but by unauthorized replicas of their own voices. This undermines not only their professional identity but also the core principles of creative labor and personality rights.

The policy recommendations outlined in this paper offer a structured roadmap to address these gaps. By amending the Copyright Act to include dubbing as a protected performance, mandating royalty payments, regulating AI tools, ensuring attribution, creating welfare boards, and introducing centralized digital rights management, India can move toward a more equitable and inclusive creative ecosystem. These measures will not only uphold the dignity of voice artists but also modernize India's copyright law in line with global best practices.

Moreover, a multi-stakeholder approach involving legal experts, technologists, government agencies, and artist collectives is vital to ensuring that reforms are practical, future-proof, and

grounded in ethical considerations. The protection of human creativity must not be seen as an impediment to technological progress but as a necessary complement to it.

In conclusion, recognizing the voice artist as an intellectual contributor—and not merely a service provider—is the first step toward restoring balance in the entertainment and tech industries. As India positions itself as a global content hub, it must lead by example in protecting the very voices that power its narratives—both human and humane.

