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Public Art vs. Public Domain

Are intellectual property and street art compatible?

Thomas Huthwaite & Eloise Calder

Source: @Banksy (Instagram)

About the authors

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Website profile

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We discuss some of the legal issues that arise when dealing with street art.

Introduction

Source: @Banksy (Instagram)

Banksy has taken to the courts again – this time in the form of a mural at the Royal Courts of Justice, London. The work depicts a judge striking a protester with a gavel. It was very promptly covered up and removed. The Metropolitan police have also received a report of criminal damage which could see further inquiries made into the identity of the elusive artist – but we know this is not Banky's first run-in with the law.

In fact, most street artists have faced legal challenges. This article considers a number of those relating specifically to IP.

The Art of Banksy

While Banksy has been busy in London, 'The Art of Banksy' exhibition has been showing in various cities on the other side of the world – including recently in Singapore, Melbourne, Wellington, and Auckland. It is said to comprise the world's largest collection of original and authenticated Banksy works. With his name in the title, displaying hundreds of his works, using his edgy quotes, and selling a range of prints and merchandise, you might think 'The Art of Banksy' is authorised, curated, or endorsed by Banksy himself.

Think again.

A footnote to the 'about' page reads "The Art of Banksy is not curated or authorised by the artist." Curator Michel Boersma told 1 News (New Zealand): "He doesn't like exhibitions. I dare to say that of all the exhibitions he likes us, but it's begrudgingly."[1]

Even that might be an overstatement. Banksy has publicly denounced a previous iteration of the exhibition as a "fake". He has also criticised private exhibitions in general, with his book, Wall and Piece, reading: "The Art we look at is made by only a select few. A small group create, promote, purchase, exhibit and decide the success of art. Only a few hundred people in the world have any real say. When you go to an Art gallery you are simply a tourist looking at the trophy cabinet of a few millionaires."

So, why is the exhibition allowed to continue in this form?

Source: https://www.aucklandlive.co.nz/show/the-art-of-banksy

"Copyright is for losers" (and known authors)

Banksy is famous for declaring that "copyright is for losers". However, the artist's greatest barrier to the use of copyright is not his alleged stance on copyright – in fact, his company Pest Control Office Ltd has claimed copyright ownership from time to time. Instead, Banksy has struggled to enforce his copyright due to his anonymity.

Copyright law requires the identification of an author, which complicates matters for Banksy as he has never revealed his true identity. While his company, Pest Control Office Ltd, tries to take steps to authenticate and manage his work, his anonymity as

[1] https://www.1news.co.nz/2024/11/29/banksys-art-comes-to-wellington-without-his-approval

the original author of the works makes it impossible to assert formal ownership or assignment of copyright.

On his website, Banksy has since provided a more nuanced version of his views on copyright: “I wrote 'copyright is for losers' in my (copyrighted) book and still encourage anybody to take and amend my art for their own personal amusement, but not for profit or making it look like I've endorsed something when I haven't”.

Trade marks are for those who intend to use them

In the alternative to copyright, Banksy has sought trade mark protection for his most iconic images in various jurisdictions. Banksy’s trade mark battles in Australia and Europe have had varied results.

In Australia in 2021, Banksy applied to register the iconic ‘Love is in the Air’ and ‘Girl with Balloon’ stencils.[2] Those trade mark applications were opposed, and subsequently withdrawn in 2023 before an opposition decision could issue.

In Europe, Banksy has obtained some trade mark registrations, but his attempts to maintain those registrations have yielded mixed results. In the first instance, the EUIPO cancelled several of Banksy’s marks – including ‘Flower Thrower’ and ‘Laugh Now’ – for bad faith due to no intention to use.[3]

The problem being that Banksy had publicly confirmed these trade mark registrations were intended only to prevent others from making commercial use of the works.

However, the Board of Appeal in ‘Laugh Now’ found the evidence did not support a finding of bad faith and reversed the EUIPO’s decision.[4] There was no reason to find that Banksy’s intentions were to circumvent copyright or to use the trade mark registrations for an improper purpose. Further, the law is quite comfortable providing artistic works with both copyright and trade mark protection.

So, a picture of mixed success on the trade mark front for Banksy. This is consistent with the ongoing debate about whether or how works intended as public street art can be protected under conventional IP laws. The purpose of this article is to identify and discuss some of the legal issues that arise when dealing with street art.

What is ‘street art’?

On the canvas of public-facing buildings, bridges, lampposts, train cars, sidewalks, etc. street art and graffiti are often created, irrespective of authorisation. This form of art and communication challenges a hegemonic system, bringing visual expression out of private gallery

[2] Australian trade mark applications 2025771 and 2025772.
[3] Full Colour Black Ltd v. Pest Control Office Ltd (2020), Cancellation No. 33 843 C (invalidity); Full Colour Black Ltd v. Pest Control Office Ltd (2021), Cancellation No. 39 873 C (invalidity).
[4] Fifth Board of Appeal (EUIPO), 25 October 2022, Case R 1246/2021-5.

spaces and into the public realm, often in a confronting manner. Understandably, this can be polarising: is it art or vandalism?

"The roots of street art trace back to 1920s New York. However, it gained popularity in the 1960s and 70s when it started to be used as a mechanism for social, political and cultural messaging."

From as early as the 1980s, street art and graffiti art found its way into private art galleries. This contemporary art credibility has made street art valuable – it is commercialised through reproductions, prints, photographs, merchandise, or by adopting techniques and transferring them to a canvas or other traditional materials.

Street art is now embedded in the contemporary art movement. The likes of Keith Haring, Jean-Michel Basquiat, and then Banksy and Shepard Fairey who emerged as activists are now also contemporary designers. Only some readers will recognise Fairey's 'OBEY' posters from his street art beginnings, but almost all will recognise his 'HOPE' poster design for the Obama campaign. Both works are discussed in more detail below.

Embracing this contemporary legitimacy, street artists are now often commissioned to create their works. Even the infamous Wellington graffiti artist PORK, who has been criticised in the media over many years for his prolific tagging of the words 'PORK' and 'PORKER' across the city and around the country, has been the subject of a documentary film and has been commissioned to reproduce his works in a Wellington brewpub.

Some may argue that this contemporary legitimacy is fundamentally inconsistent with street art, which has always been ephemeral, unsanctioned, running the risk of being removed or painted over by authorities or other artists, worn by the elements, and more generally existing outside of the traditional constraints of fine art. This impermanence gives street art a unique urgency. Its messages and its expression are often time sensitive, which also resists commodification and confinement.

Another form of tension lies between the inherent accessibility of street art and the desire to retain control over it. As a form of work accessible to anyone who happens to pass by, street art is open to various potential mistreatments, including vandalism or removal, wrongful claims of copyright ownership (including by the owners of the physical property on which the works are created), or unauthorised photography, reproduction or other commercialisation.

Challenges for street art

Lack of access control

Banksy will often choose to create work in urban environments and politically charged areas to amplify his social, political, humanist, or satirical messages. For example, 'Royal Courts of Justice' (2025) noted at the start of this article was painted on the side of the court buildings. 'Slave Labour' (2012), depicting a child sewing the Union Jack bunting for the Diamond Jubilee and Olympics, was painted on the wall of a London Poundland as a protest against the use of sweatshops to manufacture the memorabilia.

In 2013, 'Slave Labour' disappeared from the wall and was put up for sale in the US. Following backlash from the UK residents where the mural was originally placed, the work was subsequently withdrawn and returned to auction at the UK. In 2018, the mural was sold again to UK-based artist Ron English – a street artist and alleged friend of Banky's. English publicly vowed to whitewash the work on the basis that "[street art] shouldn't be bought and sold... We're tired of people stealing our stuff off the streets and re-selling it so I'm just going to buy everything I can get my hands on and whitewash it." Ironically, he then added that he would try and sell the overpainted work for $1 million, claiming "I'm crazy, but not stupid".[5]

In New Zealand, street artist Cameron Hunt made national news for the humorous fake Wellington City Council signs he has posted around the city. This includes a sign warning people 'not to feed the crocodiles' at the Botanical Gardens and another offering scuba diving lessons at 11.00am every Saturday in the water feature in a public park. Heralded as 'Absolutely Positively Ridiculous' – a take on the council's official 'Absolutely Positively Wellington' signage – Hunt's work has been praised as a harmless bit of fun.[6] However, Wellington Council stepped in to remove the sign at the Botanic Garden, explaining that they didn't want people to expect or be concerned about crocodiles. There's no telling how long the other signage will last before it's also removed.

The downside of placing works in such visible and accessible spaces is that artists run the risk of their works being critiqued, altered, removed, photographed, or re-used by others. There is no 'access' control, so there is no telling when or how someone might misuse their works.

Unfortunately, there are limited solutions to this problem, but artists can seek to limit access (e.g. the use of height often helps), obtain authorisation and protection from the land owner or council, and use materials to their advantage (e.g. special paint coatings).

[5] https://news.artnet.com/art-world/ron-english-will-whitewash-banksy-1397023
[6] https://www.1news.co.nz/2025/03/30/wellington-street-artist-pranks-city-council-with-fake-signs/

Source: 1News

Incidental use vs. deliberate exploitation

Generally, copyright is not infringed by the incidental copying of the work, including in photograph or film.[7] However, this incidental use defence will not include use in which the street art is the focus, or potentially even a key part of the composition. The use of street art as a key backdrop to a new work may therefore still amount to infringing use.

A brief warning then for photographers, videographers, and influencers. While it may be okay to take photographs of street art for personal use or incidentally, you could infringe copyright by publicly posting images of street art on social media platforms. The risk and potential liability is increased if your use is also for commercial purposes. Some social media influencers receive sizeable payouts for posting advertisements or linking their content to other brands or products on their profiles. The inherently commercial nature of influencer platforms can land them squarely in copyright infringement territory.

Moving beyond arguably incidental work, street artists often face deliberate exploitation. In 2019, Poneke-based mural artist, Xoë Hall, discovered that her Bowie work on Ghuznee Street was being used without her permission on a cheap calendar sold in major retail stores like Whitcoulls. This type of copying and commercial use without permission clearly amounts to copyright infringement.

[7] New Zealand Copyright Act 1994, section 41; Australian Copyright Act 1968, section 67

In the US, Mercedes-Benz was threatened with lawsuits by several artists after their street and graffiti art were used in the background of an advertisement.[8] Similarly, contemporary artist, Ai Weiwei, won a copyright lawsuit against Skandinavisk Motor Co. A/S after his work 'Soleil Levant' was used in the background of a Volkswagen Polo commercial. The Danish Court's decision explained: "The exploitation caused a certain risk of diluting Ai Weiwei's artwork and had the character of a parasite on Ai Weiwei's good name and reputation."[9]

Between 2002 and 2003, US graffiti artist, Hiram Villa brought two lawsuits against a publishing house who had reproduced an image with his graffiti mural without his permission in the 'Tony Hawk's Pro Skater 2 Official Strategy Guide'. In the first instance the suit was dismissed as it was held that the mural in question had not been federally registered (in the US artists must apply to have their copyright registered in order to benefit from its protection). Villa sought to register his work and brought a second suit. The case settled outside of court for an undisclosed amount.

Recently, three UK-based street artists filed a lawsuit against Vivienne Westwood and retailer, Farfetch, for allegedly selling clothing printed with their artwork.[10] They allege that Westwood has done so to "lend credibility and an aur of urban cool to their apparel" also calling out that this is not the first time the designer has used artists' works without their permission.

The street artists here have argued that in using their tags, it suggests that they are somehow affiliated with or have endorsed Westwood's brand. They claim that their reputation will suffer as they will be regarded as "corporate sellouts, willing to trade their artistic independence, legacy and credibility for a quick buck". How this case progresses through the courts is certainly one to watch, not only as an indication of how prevalent infringement of street artist's works can be but also for how international street artists may be able to protect their works in the US.

Relevant factors in all copyright infringement assessments will include whether the unauthorised use goes beyond being merely incidental, and whether it reproduces a substantial part of the work (assessed qualitatively rather than quantitatively).

"The key take-home message here is that New Zealand and Australia have very limited 'fair use' exceptions."

[8] https://jlpp.org/whose-right-is-it-anyway-the-messy-intersection-of-graffiti-street-art-and-copyright-law/
[9] https://www.artnews.com/art-news/news/ai-weiwei-volkswagen-lawsuit-12995/
[10] Smith v. Vivienne Westwood, Inc., Case No. 2:25-cv-01221 (C.D. Cal. Filed 02/12/25)

Vandalism and removal

Sometimes, street art is intended to be ephemeral. New Zealand artist Dside painted large murals of endangered and extinct animals on buildings and walls that were destined to be pulled down for urban development – documenting their extinction along the way.

However, what happens when a commissioned work does not receive the treatment the artist believes it deserves? For example, what happens when a street art mural is covered with adverts, posters or billboards – is this a form of denigration or misuse?

A number of local artists have expressed frustration over the posters that get plastered over their prominent works – such as the Dside shark mural situated near the Wellington waterfront. While Dside has openly expressed that he does not mind the public photographing his works, he does take issue with people trying to monetise such works, and does take issue with the commercial denigration of pasted advertisements particularly when companies know the artwork will draw viewers.

In 2013, a new Banksy work of a bandaged red balloon popped up in Brooklyn on a warehouse owned by Vassilios Geordiadis. However, almost immediately after appearing, other NYC based graffiti artists began to feud on the same space of wall. This resulted in other tags like "Omar NYC" being sprayed in the same space as Banksy's work and even a sledgehammer attack on the wall.

In an unusual move, Banksy allegedly returned to the site to retaliate against the defacement. Days after the "Omar" tag was sprayed, a seemingly sarcastic little phrase

was stencilled beside it – "is a little girl". Banksy has never confirmed that he was responsible for the stencilled comment, however, auction house President Arlan Ettinger said that the manner of stencilling and phrase "strongly suggest that this was a gentle way for Banksy to put the other artist in his place".[11]

"Only a day after Banksy's latest mural the 'Royal Courts of Justice' appeared on the side of the courts in London, it was scrubbed from the wall."

Creating a work on a public building like this is technically considered vandalism, and it is the building owner's right to remove it – a risk that street artists are aware of. In this instance, painting over the stone architecture to remove the image was not possible however, in attempting to scrub the work from the building's façade, it has left an eery shadow of the former mural.

While the removal may not have been what Banksy had intended to have happen, it is a risk that he is well aware of and, it has brought wider attention to the piece as the still visible ghostly outline of the judge beating down a protestor with the gavel has ignited conversation about censorship around public protests.

[11] https://apnews.com/article/banksy-auction-nyc-brooklyn-warehouse-heart-mural-61f6702347e1be307c5eb9d960d67348

There is at least one case in which the removal of street art has resulted in lawsuits. Over the course of some years, a developer had allowed street artists to cover his 5Pointz warehouse property. Street artists travelled internationally to add to the graffiti mural. However, the developer suddenly whitewashed the building in anticipation of it being remade into luxury apartments without informing the artists. This resulted in them bringing a lawsuit against the developer. In 2018, the US Supreme Court ordered the developer to pay US$6.75 million in damages to the group of graffiti artists citing that the works had generated "social media buzz" and had obtained "recognised stature".[12]

Sale & resale rights

In New Zealand, the Artist Resale Royalty Scheme came into effect on 1 December 2024, with the first royalties in the amount of NZ$152,000 paid to some 126 artists in March 2025. It is beyond the scope of this article to further analyse the scheme in New Zealand (read more in, Resale rights for visual artists in New Zealand by 2024), but it is a significant tool for artists to continue benefiting from their art for many years after it has left their hands. It also poses interesting questions in relation to street art.

For example, would the sale of an original Banksy artwork (which was never sold by Banksy himself) attract resale rights? How about the sale of a photographic work based on the original artwork?

In some countries, the answer to the first question is undoubtedly 'yes'. In the UK, Banksy is listed as eligible for resale royalties under the official DACS website, and in the description of some auction lots in the UK and EU, it is made clear when resale rights apply to the sale of his works – even if not strictly 'resale'.

However, for the sale of works in the US, such as the 'Battle to Survive a Broken Heart' that went up for auction earlier this year, it is unlikely Banksy would receive royalties as the US does not have such a scheme in place.

In countries where resale royalties would apply, the money would be paid to Pest Control Office Ltd in the first instance and then passed along to Banksy.

"But in a world where his artworks, whether or not this was the original intention, are fetching up to millions of dollars, why shouldn't Banksy benefit?"

Source material

Copyright does not exist in works that are a copy, or to the extent that they are a copy, of an existing copyright work.[13] However, street art, like various other forms of art, often uses an existing work as point of reference. Take, for example, the Rita Angus works mentioned above.

[12] Cohen et al. v G&M REALTY L.P. et al., Case No. 13-CV-05612(FB) (RLM), decision of 12 February 2018 pg. 31
[13] New Zealand Copyright Act 1994, section 14(2)

Created by Kiwi street artist Askew One, this mural tribute is based off an iconic Theo Schoon photograph. This photograph, which is held by the Auckland Art Gallery, is still under copyright protection. To create the mural, a license would have had to have been obtained to copy the photograph, and the artist would potentially have had to waive any claim to copyright in the resulting work. It is important that any artist being commissioned checks that the commissioner has cleared any potential copyright issues.

In 2020, Kiwi-artist Flox was commissioned to create a hand-painted mural on Ashburton's tallest building. A concept design was agreed upon, however, before the work could start issues arose in relation to the cost of the commission. When this couldn't be settled, the building owners settled on paying the concept fee but would not follow through with the project. Less than a year later, a mural similar to the one Flox had designed was created on the building.

The infringing mural was a low-quality version of Flox's original design - close enough for people mistakenly believe that it was hers, but a poor enough imitation to be damaging to her brand and reputation. As a result, she sought to have it removed. While the building owners had paid the concept fee, there had been no transfer of copyright ownership or licensing agreement that allowed them to use that design.[14] As such, they had no right to the design.

As an example that has ended up before the courts, US-based street artist Shephard Fairey and The Associated Press eventually settled following a two-year long copyright

[14] https://www.1news.co.nz/2023/03/06/not-my-work-kiwi-artist-wants-mural-removed/

lawsuit. The parties were suing each other over who owned the copyright to the iconic Obama "Hope" poster.[15] The Associated Press had argued that Fairey was profiting from a photo taken by a photographer under their employment. However, Fairey argued that he had sufficiently transformed the image so that it fell under the copyright doctrine of fair use.

In the US, the doctrine of fair use permits the use of copyrighted material in certain circumstances including considering the transformative use of the work. In New Zealand and Australia, we have a much more limited exception of 'fair dealing'. Briefly, fair dealing is a narrow set of privileges that allow copyrighted material to be used without the copyright holder's permission – i.e. for purposes of research, private study, criticism, review and news reporting.

It was alleged by The Associated Press that Fairey was generating hundreds of thousands in sales of the image after it became the centre piece image of Obama's presidential campaign. Though the exact financial settlement is confidential. The two parties reached an agreement purporting to share the right in the image and collaborate on future images.

Protecting your street art

In New Zealand and Australia, street art is prevalent across many of the larger cities' art scenes. Wellington and Melbourne are renowned for it. Wellington is home to the well-known 'Shark Mural' by former duo BMD, the 'Bowie' mural by Xoë Hall, and the 'Rita Angus' murals by Askew One (based on a Theo Schoon photograph) and Sean Duffell (based on an iconic work by Rita Angus herself). The city's quirky, artsy identity is reflected through its painted walls and spaces, and street art tours run across the city to encourage people to view and experience these works as though the city itself were a living art gallery.

[15] https://www.wired.com/2011/01/hope-image-flap/

However, there is a common misconception that when an artwork is visible or created in a public space, it is part of the public domain and therefore without rights. This is not the case. Just because a work is freely accessible to the public, does not mean it is free for anyone to use however they like. While it is often considered that there is an unspoken agreement between street artists and the public that their work may be photographed for personal use, these public-facing works are a form of original artistic expression which entitles the artists to bundle of legal rights.

Copyright protection

Copyright subsists in original artistic works.[16] This includes graphic works such as paintings, drawings and prints.[17] While 'painting' is not defined in either the New Zealand or Australian Copyright Act, it is generally accepted that street art qualifies as an artistic work. Provided that the street art satisfies the originality criterion (a low threshold), then the artwork will be protected by copyright.

To be original, a work must involve some independent skill, labour or judgement on the part of the creator. At a basic level, the work must not be copied from anything else. Street artists typically have unique and distinctive styles that differentiate them from one another. Much like any other 'traditional' artist, certain tones, colours, textures, and subject matters can often be associated with a particular person. In these cases, the originality criterion should be easily satisfied, and the artist and artwork should benefit from copyright protection.

Even if, on a subjective level, there is little artistic merit to a particular work, it is still likely to qualify as original on an objective level – or simply as a result of a certain amount of skill and labour.

Copyright protection grants the artist, as the author and therefore the original owner of the work (subject to any exceptions created through employment, commissioning or contract), certain exclusive rights such as the rights to reproduce, sell, distribute, and otherwise communicate the copyrighted work. Significantly for this discussion, it prevents others from copying an artist's work without their permission and benefiting from such copying/reproduction. This protection lasts for the duration of the artist's lifetime plus 50 years at which point the artwork officially enters the public domain.[18]

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[16] New Zealand Copyright Act 1994, section 14; Australian Copyright Act 1968, section 32
[17] New Zealand Copyright Act 1994, section 2; Australian Copyright Act 1968, section 10
[18] Under the new Fair Trade Agreement (FTA) with UK, New Zealand will extend copyright protection to last the lifetime of the artist plus 70 years, to align with the UK's Copyright, Designs and Patents Act 1988. We have 15 years from FTA entered into force (2023) to make this change.

Trade mark protection

A trade mark is a distinctive sign that identifies the source of a product or service. There are numerous elements of an artist's work that could be registered as a trade mark.

However, they must be intended to be used in trade in relation to specific goods or services, identified at the time of filing the trade mark. Examples include:

- A name or pseudonym – such as ANDY WARHOL, registered as a trade mark in New Zealand and Australia for a wide range of goods, mostly relating to art supplies
- Signatures or stamps – such as Salvador Dali's distinctive signature, registered as a trade mark in New Zealand and Australia for a range of consumer goods:

- Other logos or designs – such as Fairey's 'OBEY' poster (already referenced above), registered as a trade mark in Australia for various goods including clothing:

As indicated in the Banksy example above, it can prove challenging for artists to register and maintain trade marks if they do not intend to apply them to the relevant goods or services for which they are registered. However, if properly commercialised, it is possible to renew a trade mark every 10 years, in perpetuity.

Contractual protections

Street artists should not underestimate the importance of contractual protections, especially as a lot of street art in New Zealand is made on a commission basis. Make sure that when you are commissioned to carry out a work, it is clear in writing between you and the commissioner, what your legal and moral rights are.

"In an ideal world, IP lawyers would encourage all street artists to only do work, paid or unpaid, when there is a written contract."

It is also recommended to clearly include your name, date and the copyright © beside your works as a means of showing ownership, as well as documenting the work that you have done in a catalogue.

Conclusion

In some ways, street art walks a tightrope: it is accessible and public; its origins are edgy, anti-law, and anti-establishment; yet, it has also become accepted by the art world, commercially valuable, and misused by others for their commercial gain.

Many artists working in (and on) other more 'traditional' mediums know of their IP rights, which are easily defined. However, the conversation for street art is still young, and potential issues more often than not have gone untested.

Whether you love or hate Banksy, he is undoubtedly the modern face (or perhaps rather, the 'name') of this artistic movement. As much as we cringe at his past open disparagement of copyright, he has at least engaged in the conversation about what the law can and should be doing to protect works of street art.

As of today's date, Banksy's website reads: 'Saying "Banksy wrote copyright is for losers in his book" doesn't give you free rein to misrepresent the artist and commit fraud. We checked'.[19]

Source: www.banksy.co.uk/licensing.html

[19] https://pestcontroloffice.com/use.asp

www.ajpark.com

Thank you.

If you have any questions about your IP,
we're here to help.

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