

Friday 4 August 2023

Department of Industry, Science and Resources
c/o Technology Strategy Branch

By email: DigitalEconomy@industry.gov.au

To whom it may concern

RE: Submission in response to the Safe and Responsible AI in Australia Discussion Paper (2023)

The Australian Libraries and Archives Copyright Coalition (ALACC) welcomes the opportunity to respond to the Department of Industry, Science and Resources *Safe and Responsible AI in Australia Discussion Paper (2023)*. The ALACC is the main consultative body and policy forum for the discussion of copyright issues affecting Australian libraries and archives. The members of the ALACC support a copyright framework that appropriately protects the interests of rights holders while ensuring access to important cultural, educational and historical content for the public's benefit. More information about the ALACC is available at alacc.org.au/about.

Australian archives and libraries have adopted AI technologies and have been providing advice to their communities on this complex and rapidly evolving area. Given the rapid development of AI and the complex issues that have arisen because of it, we support a robust conversation around the opportunities and challenges of AI to ensure a fair and balanced regulatory response. We support the adoption of the OECD AI principles through the recently developed Australia AI Ethics Framework and support this framework as a basis for discussions on AI.¹

Libraries and archives play a fundamental role in the collection, preservation and dissemination of knowledge and culture to communities across Australia for their

¹ Australia Ethics Framework 2019

<https://www.industry.gov.au/publications/australias-artificial-intelligence-ethics-framework/australias-ai-ethics-principles>

enrichment and enjoyment, and the advancement of knowledge and innovation. Access to information has been transformed through the evolution of digital technologies. This has led to increased public engagement with Australia's cultural heritage and higher expectations for access to material. Opportunities and risks arise in providing access to material held in library and archive collections for the development of AI and related technologies.

The uncertainties around copyright law make the development of AI technologies challenging. Questions arise about the copyright concepts of authorship and ownership in relation to AI generated outputs. We support further discussion on optimal copyright settings going forward.

Libraries and archives are interested in possible applications of AI technologies to streamline work and enhance collections. It is important for the sector that these solutions are ethical and legal. The ALACC will be participating in the upcoming Ministerial Roundtable on Copyright Reform which is focused on copyright and AI. This roundtable is facilitated by the Attorney-General's Department and brings together stakeholders to discuss one of the significant legal issues surrounding AI, especially generative AI tools. We strongly recommend that the Department of Industry, Science and Resources is involved in that roundtable discussion to ensure a cohesive approach to regulation and policies across government.

Libraries and archives are users of AI technologies and will continue to embrace them to make our collections more accessible and usable for the public. This includes adopting new technologies to streamline cataloguing and administration of collection metadata and the discoverability of collections through enhanced search functionality. We support the joint submission of our colleagues from Australian Library and Information Association (ALIA), Council of University Librarians (CAUL) and National and State Libraries Australasia (NSLA) which outlines in more detail the potential impact of AI technologies on the library and service information sector.

The ALACC welcomes the opportunity to be involved in further discussions related to this consultation and support discussions for safe and responsible AI in

Australia. Our contact for inquiries is Sarah Powell, who can be contacted at sarah@alacc.org.au or on 02 6262 1118.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Heazlewood', with a stylized flourish at the end.

Justine Heazlewood

Chair

Australian Libraries and Archives Copyright Coalition