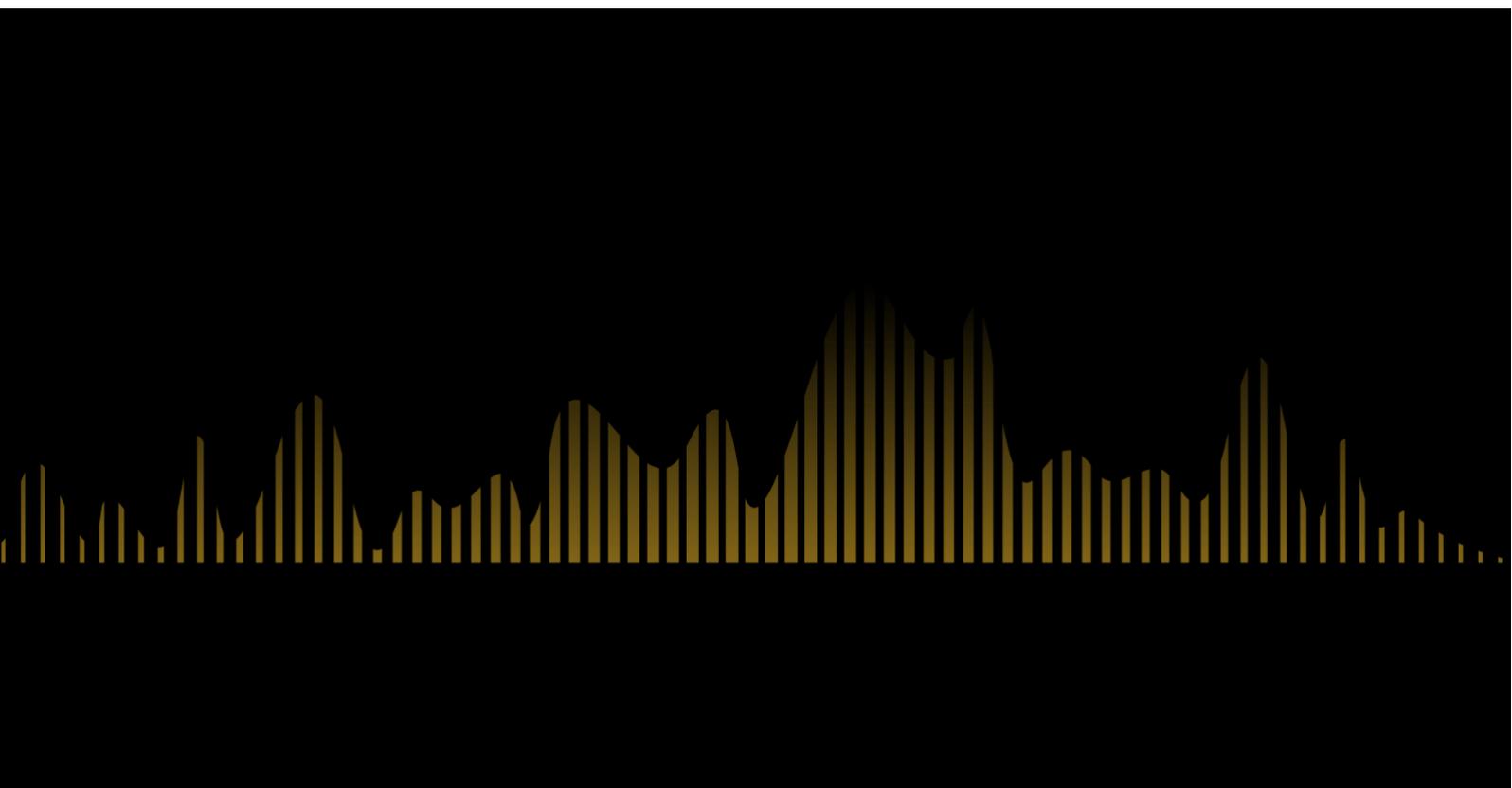# AAVA

AUSTRALIAN ASSOCIATION
OF VOICE ACTORS

Submission to the
Environment and Communications References Committee
into the National Cultural Policy

By
Australian Association of Voice Actors

The Australian Association of Voice Actors (AAVA) is a not-for-profit association for those who work as Voice Actors and those who facilitate and draw income from the Voice Acting industry in Australia, including Casting Directors, Agents & Management, Audio Engineers, Sound Recordists, Creative Agencies, Manufacturers and Suppliers of Audio Equipment, and Audio Production Studios.

AAVA is a proud member of United Voice Artists (UVA) a worldwide group of Voice Acting Guilds, Unions and Associations.

> *We acknowledge that we live and work on Aboriginal land.*
> *We pay our respects to Elders past and present.*
> *We thank them for their custodianship of land and waterways,*
> *stories, and song, and pay our respects to the oldest storytelling*
> *civilisations in the world.*

This submission refers to the National Cultural Policy released on 30 January 2023, with "specific reference to opportunities, risks and challenges for Australia's arts and creative sectors associated with emerging technologies such as artificial intelligence".

OVERVIEW

In recent years, productivity has declined in some industries, including mining, utilities, financial services, manufacturing and construction, yet this has not been reflective of the creative sector. Generative AI technology, unregulated, as it is currently progressing, is likely to dramatically change that trajectory.

In December 2024, The Australian Government released two reports highlighting the significant contribution the cultural and creative sector is making to the economy and examining its trends post-COVID. The research conducted by the Bureau of Communications, Arts and Regional Research found that cultural and creative activity contributed $63.7 billion to Australia's economy in 2022–23. This is an increase of 62 per cent over the last 15 years and equates to 2.5 per cent of Australia's GDP in 2022–23.

Whilst the Australian Association of Voice Actors (AAVA) acknowledges that artificial intelligence will see benefits in some sectors of the economy, various applications and uses of AI in the creative sector will lead to mostly negative impacts. The Productivity Commission's (PC) Interim Report into Harnessing Data and Digital Technology[1] displayed a tendency to discuss 'AI' as "all purpose", a blanket one-size-fits-all term. AAVA strongly recommends that the government make clear separations between the various uses and applications of AI technology to preserve and protect Australia's creative culture and workforce.

Generative AI, in broadcasting, media and the creative sectors, is increasingly being used to replace the jobs of creators and performers rather than assist them or enhance their creativity. Mainly used by business owners as an exciting tool to complete a creative job faster and cheaper, Ai is already having a negative impact on livelihoods and a regressive effect on Australia's cultural output - the exact opposite to the third principle that your National Cultural Policy - Revive seeks to avoid: **"Artists and arts workers have career structures that are long-term and sustainable, supported by vocational pathways."**

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[1] https://www.pc.gov.au/inquiries/current/data-digital/interim

The benefits that sectors such as logistics, administrative, financial and, potentially, medical will see thanks to AI technology share no parallels to the effect that generative AI technology will have, and is currently having, on the creative sector. A "light touch" approach to regulating all Artificial Intelligence might see possible productivity benefits for some industries but this will come at the expense of Australia's lucrative and precious creative industries, causing deep and difficult-to-claw-back cultural harms.

Our response will refer to creative work in the advertising industry and commercial radio specifically. AAVA would like to stress the importance of these sectors of the creative/media industries to the longevity of a creative career. These are areas that Australian performers, writers, technical crew and producers work in to build skills and supplement their income when more "culturally significant" work is unavailable.

LEGISLATION OR SELF-REGULATION?

On September 2024, the Australian Government published a Voluntary AI Safety Standard[2] that states, "Organisations must provide processes for users, organisations, people and society impacted by AI systems to challenge how they are using AI and contest decisions, outcomes or interactions that involve AI." A clear industry-accessible mechanism for this, or any standard practice for compensating creative artists for loss of income due to AI is yet to be seen.

The Australian Government's own AI Ethics Principles[3] states that "AI systems should respect human rights, diversity, and the autonomy of individuals." No steps have yet been taken to ensure that individuals have autonomy over their voice, image, or likeness, indicating that voluntary standards and principles are not enough.

With Deepfakes and AI-generated images populating our media and the internet, **transparency** and **labelling** of AI-generated content should be a priority for the Australian Government. After all, the Australian Government's AI Ethics Principles also state that, "There should be transparency and responsible disclosure so people can understand when they are being significantly impacted by AI, and can find out when an AI system is engaging with them."

There are no broadcasting or advertising standards in Australia at present that reflect this point. Self-regulation is not taking place when it comes to AI, Australian creative workers and Australia's cultural fabric need certainty and protection.

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[2] https://www.industry.gov.au/publications/voluntary-ai-safety-standard/10-guardrails
[3] https://www.industry.gov.au/publications/australias-artificial-intelligence-ethics-principles/australias-ai-ethics-principles

GENERATIVE AI - THE NEGATIVES

COPYRIGHT – Large Scale Theft

It needs to be acknowledged that the widespread abuse of copyright laws by AI companies to train their large language models sees only one beneficiary; offshore-based tech companies who employ very few Australians and pay little-to-no tax in Australia. Wealthy tech companies are drawing massive financial benefits by co-opting the skills and work of others, with no remuneration. This benefit only flows one way, as the creative workers who produced the material and performances share in none of that wealth. In any other market situation this would be called theft.

AAVA strongly rejects the suggestion that AI Data Training be exempt from copyright laws and would like to draw specific attention to the vulnerability of First Nations artists and creators. As mentioned in *Revive*'s Other Key Measures, the government's wish to introduce: **"stand-alone legislation to protect First Nations knowledge and cultural expressions, including to address the harm caused by fake art…"** it is essential to keep the continuously evolving art and cultural identity of Australia's original inhabitants secure by labelling AI-generated works.

Retrospective payment for works already used must be made, and prior consent for all future works used should be sought, particularly as these AI applications compete against the same body of creative workers in the exact same market.

BIOMETRIC DATA – Exploitation of Voice, Image & Likeness

Generative AI applications that produce audio, image and text are not only built on the hard work, ideas and intellectual property of the creative sector. These works also contain the biometric data (voice, image and likeness) of Australian performers and Australian citizens. Biometric data is one aspect that seems to be largely overlooked in almost every Government report on AI.

The biometric data of performing artists such as voice actors, actors, models, dancers etc. is contained within the copyrighted works that tech companies are "scraping" to train their AI models with. Once again, no remuneration, or the bare minimum of consent from those whose image, voice or likeness is being used was gained.

Voice actors in Australia are already losing work to digitally created, synthetic AI voices[4]. Sometimes those voices are clones of an actor's own voice[5], creating direct competition to that person with no compensation or consent from the originating voice actor[6].

Whilst this is currently a problem for the voice acting industry, it is also a growing menace for every Australian citizen.

Your second principle in *Revive* states **"All Australians, regardless of language, literacy, geography, age or education, have the opportunity to access and participate in arts and culture."** Participation is one thing but AI technology has taken possibilities to a place never before conceived such as deep-fakes and voice clones. To have all Australians subject to having their biometric data stolen due to lax or watered down protections is a massive opportunity missed.

Current laws afford a person zero autonomy over who can use their voice, face, image or likeness.

TRUST, DIVERSITY & CULTURAL INTEGRITY IN MEDIA

One of the most destabilising problems this century is the rise of misinformation and disinformation due to social media. Generative AI has now multiplied this problem exponentially, diluting culturally unique and significant Australian voices at an automated and industrial scale.

AI tools make it easy for anyone to create synthetic voice clones of real people: to create deep fakes (fake images and videos) that misrepresent a real person or trick audiences into believing a completely synthetic "person" is real. The growth of deep-fake actors, performers and presenters is a threat to the integrity of genuine Australian storytelling and our national identity, particularly when a deep-fake or voice-clone cannot be distinguished from the real thing.

Mandatory regulation of AI is clearly required as voluntary regulation is not taking place. This was seen recently when the Australian Radio Network (ARN) was exposed for using an AI-generated host dubbed "Thy"[7] for 6 months without disclosing it to listeners.[8]

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[4] https://www.theguardian.com/technology/article/2024/jun/30/ai-clones-voice-acting-industry-impact-australia

[5] https://www.abc.net.au/news/2024-05-24/australian-voice-artists-losing-work-to-their-ai-clones/103885430

[6] https://www.sbs.com.au/news/article/cooper-heard-his-voice-on-a-show-but-he-never-recorded-the-script/1fxhgs18k

[7] https://www.smh.com.au/culture/tv-and-radio/thy-has-been-on-the-radio-for-six-months-turns-out-she-isn-t-real-20250424-p5ltxi.html?js-chunk-not-found-refresh=true

[8] AI RADIO HOST https://www.independent.co.uk/tech/ai-radio-host-australia-cada-elevenlabs-b2740033.html

In an open letter to ARN, AAVA's Vice President Teresa Lim, herself a Chinese-Australian voice actor and broadcaster, said, *"ARN, did you actually think using 'Thy' was a tick in the diversity box? Because for the very limited number of us actual Asian Female broadcasters who have fought our entire careers for more wider and inclusive representation in Australian media, this move is tokenistic and exploitative."*

Despite worldwide negative publicity[9], ARN and Commercial Radio & Audio Australia (CRA) have been slow to act and have not made any public statements regarding a policy regarding the use of AI-generated voices.

Australians deserve to know if the content they are consuming is created by humans or generated by an AI machine-based algorithm. Mandatory explicit labelling and watermarking of AI-generated content is the bare minimum that Australian citizens deserve.

LABOUR DISPLACEMENT – Creative Jobs Lost to AI

Whilst groups such as the Australian Chamber of Commerce and Industry (ACCI) note that AI is already improving business productivity, it cannot be ignored that voice actors have been seeing a downturn in income for the last 12 months. Some industries will greatly benefit from AI technology while some will need protection from its misuse or overuse.

According to the APRA AMCOS 'AI and Music Report', by 2028 23% of music creators' revenues will be at risk due to generative AI, an estimated cumulative total damage of over half a billion AUD$ (AUD$519 million)[10]. The 2025 State of Voiceover Survey[11] The National Association of Voice Actors (USA) found that 14% of voice actors had knowingly lost work to a synthetic voice. How is this upholding the long-term and sustainable careers and culture of Australian creatives over the next five years when *Revive* will already be starting from a lower base than most of us expected?

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[9] https://metro.co.uk/2025/04/25/radio-station-slammed-pretending-show-hosted-asian-woman-22971806/amp/
[10] APRA AMCOS Report https://www.apraamcos.com.au/about-us/news-and-events/ai-in-music-report
[11] NAVA VO Survey https://navavoices.org/voiceover-survey-2025/voiceover-survey-2025-part-3-ai/

GENERATIVE AI, SPECIFIC USE CASE - AMAYSIM TVC

AI-generated "actors" in a still from the Amaysim TV commercial.

In recent months two employees of Singapore-owned Australian mobile provider Amaysim created an entire TV commercial[12] by using generative AI. The economic benefit of using Generative AI in this case was not delivered to the Australian economy, but to an offshore Silicon Valley tech company (Adobe) and via cost-reductions to Singtel, Amaysim's Singapore-based parent company. No financial injection to the local economy was seen.

Amaysim proudly admitted that this commercial would usually require a large production crew to complete. The following list reflects the local creative industry jobs, not including adjacent businesses that would benefit from a film production's contribution to the Australian economy. As noted by Creative Australia[13] "...artists and creators are typically practising as sole practitioners or as part of small businesses, and Generative AI (Gen AI) products and services cause harm to them."

Typically, a commercial such as this would shoot over a two day period, often resulting in small businesses local to the shoot, such as cafes, drawing financial benefit. The following table lists the jobs/roles that were not engaged in employment by creating this one Amaysim TV commercial using generative AI rather than Australian creative workers.

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[12] Amaysim TV Commercial https://youtu.be/8n_BR5-gA8A?si=yfvETOVvA6aFmYQK
[13] Creative Australia Website creative.gov.au

Jobs Lost to Amaysim AI-generated Commercial

Director	Best Boy (electrician)	Video Colourist
Assistant Director (1st)	Boom Operator	Composer
Assistant Director (2nd)	Voice Over Artist	Concept Artist
Cinematographer	Casting Director	Actors x 5
1st Assistant Camera	Assistant Casting Director	Costumer
2nd Assistant Camera	Casting Associate	Data Wrangler
Art Dept Coordinator	Casting Coordinator	Dolly Grip
Editor	Construction Coordinator	Field Producer
Assistant Editor	Actors' Agents	Gaffer
Audio Recordist	Catering Company	Grip
Hair Stylist	Lighting Design	Line Producer
Location Manager	Location Scout	Makeup Artist
Prop Master	Transportation / Drivers	Set Medic
Sound Assistant	Sound Designer	Steadicam Operator
Still Photographer	Talent Booker	Production Runner
Travel Coordinator	Video Editor	Wardrobe Assistant

Although there will no doubt be benefits to some sectors that will make the adoption of AI technology a positive move, without wholesale labour displacement, it must be noted that unregulated use of AI technology with no consideration to Australian creative works, performances, and the biometric data contained within those works, will have lasting negative impacts on Australia's creative and cultural industries.

In Creative Australia's Review of AI and the Australian Consumer Law[14] (Nov 2024), transparency is a key recommendation. "From a consumer perspective, transparency is vital to protect consumers from the potential harms of AI. Consumers should be aware of whether a product or service they are consuming has been generated by Gen AI so that it cannot be passed off as the work of an artist or creator."

This report also acknowledges that the creative labour force is also at risk due to the rapid uptake of generative-AI: "AI, like other digital technologies, is transforming our arts and cultural landscape – facilitating the creation, and enabling the consumption, of AI-generated cultural products (e.g. music, images, video, literature). However, artists and creators are

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[14] https://creative.gov.au/sites/creative-australia/files/documents/2025-03/Creative-Australia-Submission_Review-of-AI-and-the-Australi an-Consumer-Law-November-2024.pdf

typically practising as sole practitioners or as part of small businesses, and Generative AI (Gen AI) products and services cause harm to them."

SOLUTIONS

Here, we will expand on the following recommendations to protect the Australian Creative Sector and Australian Cultural Autonomy from the negative impacts of generative AI:

- ▪ TRANSPARENCY

Mandatory explicit labelling of AI-generated content & digital watermarking.

- ▪ EXPANSION OF MORAL RIGHTS

Giving Australians autonomy over their voice, image and likeness.

- ▪ COPYRIGHT

Rejection of a fair-use exemption for AI training.

TRANSPARENCY

In short, mandatory AI-labelling will save creative jobs.

MADATORY LABELLING

We ask the Australian Government to establish regulatory change to introduce mandatory explicit labelling and watermarking of AI-generated audio, visual and written content. This means clear audible disclaimers on AI-generated audio content, including synthetic voices and music, and clear visible labelling on AI-generated footage, imagery and written content.

Plus, to provide transparency around how and by whom any AI content was created, we need mandatory watermarks to be present in the metadata of all AI-generated content, be it visual, audible or written.

These legal amendments will ensure transparency in the unethical exploitation of all Australian creators, plus alert Australian citizens to possible misinformation and disinformation, and the absence of human creativity in the art form or information they are relying on.

Mandatory labelling of AI-generated content will, in some instances, act as a deterrent to the use of this technology, most notably in the advertising sector, which is a major employer of the Australian filmmaking and creative communities. In short, mandatory AI-labelling will save creative jobs – ensuring that our **"arts and culture remain generative and preservative"** – the 10th principle of *Revive*.

The EU AI Act[15] includes measures which come into effect from August 2026 that will require providers using AI systems generating synthetic audio, image, video or text content to ensure that the outputs of the AI system are marked in a machine-readable format and detectable as artificially generated or manipulated.

In measures that came into effect on 1 September 2025, the Cyberspace Administration of China (the CAC) has introduced standardised requirements for providers of AI-generation and synthesis services to add explicit and implicit labels to AI-generated synthetic content, including texts, images, audios, videos and virtual scenes. These regulations aim to address deepfake-related risks and ensure the authenticity and credibility of publicly available information. International law firm Norton Rose Fullbright comments[16]: "Aligning with China's stated commitment to playing a leading role in global AI governance, once adopted, these regulations are designed to enhance the traceability and transparency of AI-generated content, reduce the spread of false or misleading information and better protect the rights of content creators and the general public. We expect that the Draft AI Labelling Measures and the Draft Labelling Method Standard will accelerate the development of AI detection technologies in China."

WATERMARKING

Keeping track of the inputs (training data) and outputs (AI-generated voices, video, images and text) will be essential as a mechanism for fair and equitable distribution of financial benefits from AI technology, once it is eventually settled upon.

Copyright and IP laws are currently being reviewed globally, with AI companies seeking free reign on copyrighted material whilst creators and producers are seeking fair compensation. Companies such as Disney, NBC Universal and Sony are all in litigation with AI companies over breaches of copyright and intellectual property. No matter the outcome, the ability to identify the system which created a video, image, voice or text will be crucial in scrutinising the data (IP) which contributed to training the AI system that generated the output.

Whilst text-based content can be difficult to watermark or accurately identify as AI-generated in the same way video, audio, and images can (with layer-able meta-data added to

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[15] https://www.europarl.europa.eu/news/en/press-room/20240308IPR19015/artificial-intelligence-act-meps -adopt-landmark-law

[16] Norton Rose Fullbright Article https://www.nortonrosefulbright.com/en/knowledge/publications/c1211a61/chinas-proposed-ai-labelling -regulations-key-points

files), transparency of training data would be useful in establishing a fair distribution of profit.

The EU Parliament's briefing on Generative AI and Watermarking (2023)[17] makes the following arguments in favour of watermarking:

- Traceability of generative AI is a key to ensuring a trustworthy environment and identifying the provenance of the data used in the production of an AI model against this backdrop. AI watermark techniques can serve to establish content authenticity and to perform content authentication.
- The technology can help creators protect their content and track down copyright infringers more effectively, discouraging the unauthorised use of copyrighted material.
- Watermarking AI-generated content also offers a helpful way to identify the origin of AI-generated disinformation. Media and news organisations, including online platforms, can use AI watermarks to indicate to readers that a piece of content was created using AI.
- Watermarks are also useful when it comes to the authentication of media content and for flagging harmful AI outputs, such as fake news and deep fake videos.

COPYRIGHT

The existing legal framework of copyright should be the foundation of ethical and fair training of AI models. Australia's current copyright laws are fit for purpose; however, AI-specific references do need to be added to the existing legislative language and definitions.

Any allowance to train AI on copyright material must exclude any allowance to input/use the biometric data (voice, image, likeness) of any person whose performance or appearance is contained in those works, even if consent and licensing by the copyright holder has been approved. Protection for bio-metric data needs to be specified.

Australia's copyright laws have worked well for creators for a long time. This is the first time in recent history that those laws have been flouted on a mass scale. Adding AI training, prompts and outputs to the list of uses that must be licensed is necessary to keep up with current abuses of intellectual property and the abilities of the technology.

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[17] https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/757583/EPRS_BRI%282023%29757583_EN.pdf

- Licensing arrangements are needed.
- Consent-based opt-in only basis.
- Back-payments/compensation for work already stolen.
- Protection from training for all bio-metric data.

AAVA strongly disagrees with the suggestion that a fair dealing exemption for text and data mining be allowed. An exception covering text and data mining would legalise historic theft by AI companies and would be out of step with global trends. In recent days, AI company Anthropic settled a $1.5 billion-dollar lawsuit[18] to a class action of authors who claimed that 465,000 pirated titles were used by Anthropic to train its Claude chatbot.

Considering again that text and data mining is what leads directly to creative workers having to 'compete with themselves' in the future work landscape, it is imperative that there be no fair dealing exemption in the Copyright Act 1968 (Cth).

MORAL RIGHTS

Australia's current Moral Rights laws are limited and only apply to individual creators, such as authors of literary, dramatic, musical, and artistic works, film directors, principal screenwriters, principal producers, and performers for their live performances and their sound recordings. Because these personal rights cannot be sold or transferred (and remain with the creator even if the copyright is sold) they are a very strong basis for protecting the integrity of an artist's work.

AAVA recommends an expansion, encompassing all performers and all citizens, of these moral rights to extend protections to an individual's voice, image, and likeness. This will give Australians non-transferable, only licensable autonomy and ownership over their own biometric data. This protection will afford performing artists the ability to monetise the skill, talent, experience, and cache they have built over the course of their careers - no matter how brief.

A moral right giving Australians autonomy over their own voice, image or likeness (including biometric data) could also provide all Australians with recourse if their likeness, via a photograph, video, or audio recording was used for profit or deceptive means.

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[18] Anthropic Law Suit https://apnews.com/article/anthropic-authors-book-settlement-ai-copyright-claude-b282fe615338bf1f98ad97cb82e978a1

EXISTING FRAMEWORKS

There is serious doubt that Australia's existing regulatory framework is legally robust enough to reign in unchecked, unlabelled, non-watermarked AI content. Legal experts have made it clear that only improved guidance and enforcement via the likes of mandatory explicit labelling and watermarking of AI-generated audio, visual and written content will mitigate the additional risks.

BROADCASTING & ADVERTISING

As the authority that oversees broadcasting licences, radio and television broadcasting rules, gambling advertising rules and telecommunications, the Australian Communications and Media Authority (ACMA) would be the appropriate arm of government to oversee guidelines for the AI-generated content in the Australian media landscape.

The following codes of practice currently must be registered by the ACMA and would be suited to additions that cover mandatory labelling of AI-generated content.

- Australian Assoc. of National Advertisers (AANA) Code of Ethics
- Children's Advertising Code
- Food and Beverages Advertising Code
- Environmental Claims Code
- Commercial Radio Code of Practice
- Community Radio Broadcasting Codes of Practice
- Subscription Narrowcast Radio Codes of Practice
- Open Narrowcasting Codes of Practice
- Commercial Television Industry Code of Practice
- Subscription Broadcast Television Codes of Practice
- Community Television Codes of Practice
- Subscription Narrowcast Television Codes of Practice
- Open Narrowcast Television Codes of Practice

AAVA has discussed the importance of AI labelling with the Australian Association of National Advertisers (AANA), the Australian Communications & Media Authority (ACMA), and Commercial Radio & Audio Australia (CRA) who are undergoing a Commercial Radio Code of Practice Review. AAVA has made a submission to the Review to encourage the inclusion of AI transparency in the Code.

Although ACMA oversees various broadcasting codes of practice, it is the organisations such as Commercial Radio & Audio Australia (CRA) who draft their own Commercial Radio Code of Practice. AAVA believes that ACMA should have a more prescriptive role that also extends to streaming services such as Netflix, Prime and Disney+.

CRA represents commercial radio stations and the companies that own them. Companies that own commercial radio stations have an active and vested interest in minimal restrictions regarding the use of generative AI technology. Generative AI technology is already giving these companies the ability to replace human broadcasters with no consideration for cultural impacts, quality or public interest.

The Productivity Commission Interim Report's recommendation amounts to a "hands-off" approach to AI regulation. This ignores the retrograde steps being taken by some operators in the broadcasting and creative sectors. The cost-cutting decisions to replace human broadcasters with AI-generated "hosts" (such as ARN) and the impacts those decisions are having on workers, quality and integrity of output cannot be understated.

AAVA's suggestion is to give ACMA more power and scope to force responsible use of AI via a more active (and widely promoted) consultation process with stakeholders such as industry bodies, unions, representative groups and employees from workforces in those sectors. The following considerations should be priorities:

- Explicit Labelling of AI-generated Content
- AI-generated Content Maximum Quotas.
- Limitations for use of AI-generated content (eg. news, emergency info)

Reviews of the Australian Commercial Radio Code of Practice are currently not actively promoted to stakeholders and interested parties. This makes the ability to participate in the process and to suggest improvements difficult, and relies on word of mouth. It would appear that, by its own design, non-participation in the review process is not encouraged.

We encourage the Australian government to make clear differentiations between the wide variety of AI systems and tools when deciding on if and how controls might be implemented.

Mandatory labelling of AI-generated content will discourage overuse of this technology and preserve work for the creative sector. Advertisers typically want to avoid building any disclaimers, terms and conditions into their commercials and avoid it where possible. Mandatory labelling will force brands to make a 'quality over price' decision when it comes to creating brand advertising.

CONCLUSION

It is clear that the unchecked spread of AI-generated content is already fuelling a decay in Australia's cultural fabric via misinformation, displaced creative jobs, stolen copyrighted works, weakened diversity in voices and the undermining of public trust in media.

Explicit labelling and disclaimers (audible and/or visual) would provide Australians with the transparency they need to make informed decisions, whilst upholding ethical standards in broadcasting and communication. As other jurisdictions are already acting, Australia risks becoming a haven for unlabelled AI content if we don't follow suit, and the hopes, aspirations and economic success of many Australians who would normally prosper, threaten to become dreams unrealised.

Australia's creative industries contribute $63.7 billion to the economy annually[19] and AI-generated ads and media - like Amaysim's recent TV commercial - are putting Australians out of work. Essentially, small business owners and sole traders are losing work to offshore tech companies who pay little-to-no tax in Australia.

Labelling won't kill the kind of AI innovation we want to see in Australia, but it will ensure Australians know when they're consuming machine-made content. Content that is not part of Australia's cultural fabric. It's a balanced, practical measure that protects consumers, promotes media integrity, and preserves jobs in one of Australia's most valuable sectors. Labelling AI-generated content is both an ethical measure and smart governance.

Protections for all Australian's Biometric data (voice, image, likeness) from non-consenting exploitation should not be up for debate. Voice-clones and Deep-fakes are a non-essential and potentially negative function of generative-AI technology that needs urgent regulation. This a never-before-conceived AI-specific tool, therefore it requires new legislative measures to combat it.

The reality must be accepted by the government that relying only on existing laws and regulations to manage the "AI revolution" does not grapple with the capability of this technology and people's potential to misuse it. A lack of action by the government will see the Australian Creative Arts sector suffer the long-term consequences.

Where existing regulatory frameworks are not sufficient, new regulation or legislation is clearly needed. If technology-neutral regulations, such as an expansion of Moral Rights or AI

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[19] https://www.arts.gov.au/news/highlighting-value-our-cultural-and-creative-activity

specific language added to existing Copyright laws are not feasible, then specific legislation/regulation should be created.

The rhetoric from the tech sector that AI technology will revolutionise the economy yet doesn't require any new guardrails, is either naive or deceptive. A one-size-fits-all approach to AI would be highly discouraged as it would not consider the diversity of uses and the negative outcomes on the creative sector.

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