SUBMISSION TO THE SELECT COMMITTEE ON ADOPTING ARTIFICIAL INTELLIGENCE (AI)

INQUIRY INTO THE OPPORTUNITIES AND IMPACTS FOR AUSTRALIA ARISING OUT OF THE UPTAKE OF AI TECHNOLOGIES IN AUSTRALIA

MAY 2024

KEY POINTS

- SBS is exploring the ways to optimise its operations and services for audiences by utilising artificial intelligence (**AI**), including to increase efficiencies. AI is going to transform the way content is made and received from end to end. SBS has in place an internal AI framework and editorial guidance.
- SBS has deep connections with, and a commitment to reflect Australia's diverse communities and voices. There are many critical aspects of SBS's content and services which cannot be replicated by AI-generated content. SBS's unique connection to community and our highly trusted and impartial content will become even more important as AI, in instances driven by opaque algorithms, intensifies the proliferation of mis- and dis-information. In this context, human-led content creation, notwithstanding how it may be facilitated by AI, becomes all the more fundamental and vital to democracy.
- Subject to Government support, there are opportunities for SBS to explore other AI-relevant initiatives that can enhance both service delivery to audiences and social cohesion, such as supporting First Nations' language perseveration, or the promotion of public literacy in, awareness of, and education about AI among all Australians, including multicultural, multilingual, and First Nations communities as well as school-age students (e.g. via the SBS Learn education platform).
- Any regulatory settings for AI must be carefully calibrated so as not to hinder constructive innovation and use in the public interest, whilst balancing the risks associated with AI such as inherent cultural or social biases, proliferation of mis- or dis-information, and the uncredited and uncompensated use (or misuse) of material produced by creative or news organisations.
- Relevant to Australia's news and media industry, there is a pressing need for AI guardrails, particularly in relation to copyright and biases (among other issues, see ***b.*** in the **Appendix**). These guardrails should not impede the positive innovation or low-risk development and deployment of AI, and should guard against eroding trust in news and media—a key concern for SBS.
- Competition, and market power, of AI providers should also be explored by the Australian Competition and Consumer Commission (ACCC).
- There may be issues arising from concentrated ownership of AI services, tools, or models, which could have similar impacts as the concentration in ownership of traditional media. However, no regulatory frameworks yet exist in relation to AI ownership, to deal with the potential threats to open democracy and social cohesion.
- Australia should prioritise developing, attracting, and maintaining digital talents who can compete with those of other countries (including in relation to data security, among other important matters).
- This submission outlines context from which the pressing need for Government-led policy or regulatory interventions emerge. Detailed responses to the Inquiry's terms of reference are set out in the **Appendix**, which includes '[k]ey suggestions relevant to policy or regulatory interventions in Australia' in response to the term of reference ***c.***

Background – SBS and positive use cases of AI

The Special Broadcasting Service (**SBS**) appreciates the opportunity to respond to the inquiry into the opportunities and impacts for Australia arising out of the uptake of AI technologies in Australia (the **Inquiry**) by the Select Committee on Adopting Artificial Intelligence.

SBS is exploring the use of AI in its operations, to increase efficiencies and automate time-consuming, repetitive, and/or technical tasks. AI has the potential to transform the content creation and distribution ecosystem, and has the potential to support SBS in the creation of its Charter[1]-led content which will always be human-led.

It is SBS's purpose to enhance social cohesion, by enabling all Australians to explore, respect and celebrate diversity. SBS aims to ensure that AI systems it utilises are trained with its diverse, accurate, balanced and impartial content[2] and supervised by its staff who are guided by SBS's purpose.

SBS has in place an internal AI framework and editorial guidance, and the overarching, robust, and publicly available SBS Code of Practice which guides everything we do at SBS. These are supported by other frameworks, policies and procedures in relation to copyright, cybersecurity, privacy, data breaches, as well as a code of conduct for its personnel. They are continually updated to ensure their currency, and that SBS's operations including in relation to AI are, ethical, within the law, and meeting SBS's expectations and objectives.

Moreover, SBS has deep connections with, and works to reflect Australia's diverse communities and voices. The human–community connections cannot be displaced by AI – for example, SBS is physically present in the communities it serves. It produces original content arising from, and benefiting the communities. SBS also continues to invest in community initiatives and celebrations, as outlined here.[3] SBS's investment includes the provision of trusted resources, career pathways, and supports a strong, successful and inclusive Australian media industry and production sector.

At SBS, assistive AI can further support social cohesion

There are positive use cases, of assistive AI tools that are able to further support SBS's purpose of enhancing social cohesion in Australia, which may also be used to improve service delivery for Australians.

Key examples of these tools are language technologies, which can further allow SBS's unique in-language stories, views and opinions from across Australia's multicultural, multilingual, and First Nations communities to be understood and shared with the wider Australian audience, and vice versa. These technologies can help, at unprecedented speed and scale, millions of audience members overcome language barriers, and accessibility or certain health issues (further to the unique *SBS News in Easy English* service), to share and understand each other's perspectives, thus strengthening social cohesion in doing so. They include

- transcribing and translation technologies; and
- AI-assisted production of subtitling, close captioning, and audio description;

among other emerging technologies.

In particular, First Nations' languages are likely to be the most difficult languages to derive benefit from AI language tools, as these are verbal-only languages with relatively limited databases. Subject to support from Government, this area of AI development and deployment is of interest to SBS, which is home to National Indigenous Television (NITV)—the only national crossplatform media service by, for

[1] The principal function of the SBS is to provide multilingual and multicultural broadcasting and digital media services that inform, educate and entertain all Australians and, in doing so, reflect Australia's multicultural society.
[2] SBS provides diverse and high-quality content, which is subject to the robust SBS Code of Practice, among many other control and regulatory measures.
[3] See 'In the community' at https://www.sbs.com.au/aboutus/in-the-community/#:~:text=We%20support%20and%20extend%20our,events%20and%20supporting%20cultural%20celebrations

and about First Nations' peoples.

Key unique opportunities at SBS

- With Government support, SBS and NITV occupies a unique position, of being the only national cross-platform Indigenous content provider, to explore what opportunities it can pursue to support Australia's First Nations' languages (this aligns with a focus of the Government[4 and 5]) through development and deployment of AI, subject to appropriate protocols and observation of and adherence to Indigenous Cultural and Intellectual Property rights.
- Similarly, with Government support, there are significant opportunities to leverage SBS's expertise in furthering public literacy in, awareness of, and education about AI. This is critical and should be available to all Australians—including those who use a language other than English and migrants (e.g. via SBS's more than 60 language services), First Nations peoples (e.g. through NITV and its online offerings), school-age students (e.g. via the SBS Learn platform), and the older population.

There is a pressing need for AI guardrails relevant to Australia's news and media industry

According to the Government, there are 'at least ten legislative frameworks that may require amendments to respond to applications of AI'.[6] SBS appreciates that the Government will consider possible legislative vehicles for introducing mandatory safety guardrails for AI in

> 'high-risk' settings (where the risks are 'systemic, irreversible or perpetual' for example, to predict a person's likelihood of recidivism, suitability for a job, or in enabling a self-driving vehicle'); and specific obligations for 'frontier' ('highly capable and potentially dangerous', and of which 'harms could be difficult or impossible to reverse') or general-purpose AI models.[7]

SBS also wishes to highlight the significant importance of, and urgent need for guardrails (or frameworks) for AI development and deployment relevant to Australia's news and media industry. The issues of concern are addressed in further detail below.

The design and implementation of the guardrails should be led by Government and involve appropriate consultation with industry participants to ensure there are no unintended consequences or hindrances to positive innovation or low-risk development and deployment of AI. They could potentially be risk-based (based on the risk of harms) or tier-based; and could include standards and codes of practice.

The guardrails should provide clarity and direction for AI services and developers, as well as users, and take into account Australia's AI Ethics Principles available through the Department of Industry, Science and Resources, and international ethics guidance available through UNESCO.[8]

The guardrails should address copyright and intellectual property issues

Legislative or policy guidance or guardrails are urgently required in particular in relation to copyright and intellectual property issues, which include the issue of proliferation of websites that repurpose content of other websites by utilising AI, with an intent to deceive audiences. Other issues warranting policy or regulatory interventions include

- Issues regarding data access and collection, data breach, and data security of AI systems;

[4] Closing the Gap, Target 16, 2023 Commonwealth Closing the Gap Implementation Plan—'By 2031, there is a sustained increase in number and strength of Aboriginal and Torres Strait Islander languages being spoken.'
[5] Indigenous Languages and Arts program, Office of the Arts, Department of Infrastructure, Transport, Regional Development, Communications and the Arts.
[6] According to the Australian Government's interim response to the Safe and responsible AI in Australi consultation, published in January 2024.
[7] Same as above.
[8] See https://www.unesco.org/en/artificial-intelligence/recommendation-ethics

- issues regarding transparency and disclosure/display when AI has been utilised; and
- issues regarding verification and correction of information generated or provided by AI.

(See further in SBS's responses to the term of reference ***b.***, and ***c.*** which includes '[k]ey suggestions relevant to policy or regulatory interventions in Australia', in the **Appendix**)

In relation to copyright laws, the guardrails could include updates and amendments necessary to ensure that the laws appropriately take into account as well as deal with AI. There are existing and emerging generative AI systems trained on large amounts of data, including copyrighted content created by media companies. In this way, there are existing and emerging lucrative new business models that are built on the investment and expertise of others, without their permission, without reference or credit, and without compensation. SBS is actively involved in this work through fora, roundtables and communications organised by the Attorney-General's Department, and would support early implementation as soon as it is practicably possible.

The guardrail should also address the issue of bias

Agreements between AI service providers with trusted institutions and content providers are being established. It is important to note that reliance on established Western, or English-language sources as the benchmark for reliability or credibility could risk perpetuating narrower, and more homogenised views, compounding biases and imbalances in relation to the power of information.

Disclosure and diversification of sources for AI systems can help mitigate entrenching biases. Embracing more inclusive definitions of reliability and credibility will provide a more balanced approach that should be fostered. Such an approach will, in turn, foster greater public trust in AI and the news and media industry (as well as others) utilising, or assisted by, AI.

Bias and relevant issues are further explored below, in response to the Inquiry's term of reference ***b.*** in the **Appendix**.

Competition, and market power, of AI providers should also be explored

SBS supports exploration by the ACCC of any emerging or existing power imbalances, as well as any market advantage pertaining to large tech giants that provide AI services and tools. (They usually also possess a vast amount of data, a competitive advantage which smaller or emerging providers' cannot compete with.) In a similar vein as through the current Digital Platform Services Inquiry, the ACCC may be able to identify and address market or competition issues relevant to AI service providers. This will provide benefits to users of AI services including entities such as SBS and the Australian consumers at large, including in relation to choices available (the diversity of options), and prices. (Many entities and users may end up paying unnecessarily high prices due to oligopoly among AI service providers.)

As an example, if Amazon Web Services (AWS) is being utilised, Amazon's own AI services are also on offer as self-preferenced services by Amazon. If entities or consumers seek to utilise other AI services, such services may not be compatible with AWS. In a similar vein, if Microsoft's Azure cloud platform is utilised, then its Co-Pilot AI tools are self-preferenced by Microsoft.

It is also relevant to note that large tech giants also control narratives of the output of their AI services, tools, or models. There is a risk of online content being increasingly controlled by a handful of large AI service providers. There are long-established legal and regulatory frameworks to mitigate any undue influence relevant to ownership. No such frameworks yet exist as regards AI, despite its potential influence being far more pervasive than that of traditional media.

Conclusion

SBS appreciates the opportunity to respond to the Inquiry. We see positive AI use cases and opportunities (underpinned by SBS's safeguards), which will assist SBS in fulfilling its increasingly important role as a provider of trusted, impartial and factual news and information. AI has the potential to both fuel the intensifying spread of mis- and dis-information, and to also enhance SBS's delivery of trusted information. SBS's services will only become even more important to the health of Australia's

democracy as mis- and disinformation continues to proliferate.

SBS would welcome Government support regarding potential initiatives that help enhance social cohesion, through supporting First Nations languages (this aligns with a focus of the Government) via AI; and public literacy, awareness, and education campaigns in relation to AI. It is also important that there be ongoing Government initiatives and funding relevant to AI. (Continued)

Relevant to Australia's news and media industry, there is a pressing need for Government-led policy or regulatory interventions that sufficiently deal with AI. They include interventions regarding copyright and intellectual property; biases; competition; market power; and the potential of concentrated ownership of AI services.

SBS has, and will continue to contribute to the betterment of AI development and deployment in Australia's news and media landscape.

APPENDIX – SBS'S RESPONSES TO THE INQUIRY'S TERMS OF REFERENCE

a. recent trends and opportunities in the development and adoption of AI technologies in Australia and overseas, in particular regarding generative AI

In the news and media industry, the following trends and opportunities are being observed.

- *Enhancement and increased quality of content production*

  Generative AI is revolutionising content production. Major film studios are now using AI technologies throughout their production processes. For instance, AI is being used to synchronise actors' performances, provide language overdubs, and create advanced special effects.[9]

- *Assistive content tools are very useful in media and journalism*

  There are tools—such as automated writing assistants and clip production—which can help provide drafts, summaries, and short-form content. These tools can help speed up the news production processes and enable news media organisations to cover more stories as well as repurpose existing content, utilising the same or reduced level of human resources. At SBS, staff will always oversee the use of, and outcomes from, these tools.

  One example is Smart Cut AI tool, reportedly utilised by CNA[10], a major newsroom in Singapore, through which a 60-minute news bulletin can be cut by automation to a 15-minute length, which can then be further cut to a 5-minute length and so on. Another example is Canva Magic Studio[11], which can be utilised to support cross-platform multimedia and journalistic content creation.

- *Enhancement of personalisation and audience engagement*

  AI is being developed and deployed to personalise content served to audiences, as well as enhance their engagement with content on providers' platforms. By analysing user preferences and behaviours, AI can tailor content recommendations more accurately, thus increase viewership and viewer retention rates.

- *Future opportunities in media*

  Opportunities are on the rise for creating more immersive and interactive forms of media, such as virtual and augmented reality experiences, and enhanced gaming and entertainment environments.

b. risks and harms arising from the adoption of AI technologies, including bias, discrimination and error

- *Content authenticity, copyright, and intellectual property concerns*

  As AI becomes capable of producing artistic and journalistic content informed by the work of human creators, issues around copyright infringement, authenticity and ownership of AI-generated content emerge. Determining issues of infringement, authorship and rights over AI-created works can be challenging, and raises questions about intellectual property rights and the ethical use of AI in creative fields. The SAG–AFTRA (Screen Actors Guild–American Federation of Television and Radio Artists) union strikes in the US in 2023 demonstrated the significant discontentment and strong will by creative practitioners in gaining an appropriate level of control over and being compensated for the use of their images or voices by AI services.

[9] https://www.technologyreview.com/2024/01/04/1086046/whats-next-for-ai-in-2024/
[10] https://www.channelnewsasia.com/singapore/mediacorp-ai-video-editing-solution-young-reporter-challenge-inma-global-media-awards-3519526
[11] https://www.canva.com/magic/

There have also been multiple reports[12], of the proliferation of websites that repurpose or repackage other websites' content using AI. Audiences may not be aware at all that they are consuming AI-created content repurposed from others' intellectual property. This puts legitimate news businesses in a position of losing traffic (and hence monetisation) to competitors who are monetising the news businesses' own content. It is a genuine threat to the viability of legitimate news media businesses, including SBS, and sufficient policy or legislative response including relevant guardrails are urgently required in relation to AI and copyright.

- *Privacy and data security concerns*

  AI systems often learn from large datasets, which potentially include sensitive, personal, and confidential information that they have accessed with or without permission. There are issues and risks associated with how the data is accessed, collected, used and stored, potentially leading to privacy breaches, or breaches of confidentiality. Without any guardrails, currently the onus is on AI users, including SBS, to be vigilant when considering the information shared with AI systems. However, users including SBS do not know the full extent and mechanisms of how AI systems access and deal with data, including when they potentially do so without permission. Guardrails in relation to data security robustness of AI systems are urgently required.

  As the appropriate possible legislative vehicle, the implications of the lack of transparency around AI use of sensitive data should be considered as part of the Government's ongoing Privacy Review.

- *Increased difficulty in information-verification*

  There have been multiple reports of AI 'flooding'[13] the internet with information, including multiple instances of information without attribution to their sources. This increases the difficulty of information verification, a process required to be performed by reputable news or media businesses including SBS. This is also related to the issues of intellectual property, and concerns in relation to data outlined immediately above, and should be addressed through industry-wide guardrails.

- *Amplified inaccuracies, bias and discrimination*

  Further to the issue of mis- and disinformation already outlined in the body of this submission, currently, sources of AI-generated content are often undisclosed, meaning that such content may derive from a range of sources including those that are unreliable and unverified, and those influenced by bias or discrimination.

  Moreover, human biases have been built into many AI technologies because those technologies have been trained on current and historical online materials, some of which reflect existing bias, inaccuracies, inequalities, inadequate representation, and discriminatory approaches. This results in an accelerated perpetuation of dominant narratives and viewpoints, and the exclusion of diverse perspectives and approaches. Many AI systems are not trained to identify or correct these approaches.

  The nature of AI systems means these issues can become more ingrained as part of their algorithms, as they are repeatedly trained. The potential consequences could include amplification of mis- and disinformation, and unequal treatments of groups based on—as examples—language, culture, race, gender, or ethnicity. The severity of these issues varies, depending on materials and data relevant to such groups being used by AI systems.

  Numerous domestic and international examples have demonstrated this risk of algorithmic bias when AI is deployed, particularly without human oversight. A well-reported example in Australia in early 2024 was how Adobe Photoshop's AI-assisted tool could potentially take different approaches when tasked to modify the appearances of females and males.[14]

[12] Such as this April 2024 report by the ABC's *Media Watch* program, and this February 2024 report by *VOA News* (US)
[13] Such as this January 2024 report *ABC News*, and this January 2024 report by *Business Insider*.
[14] https://www.crikey.com.au/2024/02/01/adobe-photoshop-generative-ai-women-politicians/

- *AI can impact overall trust towards news and media*

  This is a key concern for SBS. Generative AI can create realistic and persuasive but entirely fabricated images, videos, or narratives, yet many of these could also be influenced by bias, inaccuracies, and discrimination as outlined immediately above. In relation to error, AI technologies can also behave unpredictably (including 'hallucinating'[15]) or fail in ways that are difficult to anticipate. They can also be misused by those with malicious intent.

  Without sufficient human oversight and public literacy, awareness, and education in relation to AI, these outlined issues and errors in AI-generated or AI-assisted content, recommendation systems, or data analysis could lead to false reporting, inappropriate content recommendations, and misled audiences, impacting trust in news and media overall. In this way, AI could intensify the negative impacts arising from mass data collection and algorithms which already exist. Data-based algorithms can lead to audiences being increasingly served information and content skewed towards their biases and perspectives.

  This impact could then erode audiences' overall trust in the news and media industry and organisations, including SBS. Therefore, relevant legislative or policy guidance and guardrails, and ongoing public awareness and education campaigns are essential. Otherwise, the reduced trust among audiences can be a threat to the industry and SBS as an independent taxpayer-supported organisation which provides services and content in the public good pursuant to its legislated Charter. The negative impacts will also be felt in terms of trust in public and democratic processes.

c. emerging international approaches to mitigating AI risks

As outlined in the Government's interim response to the Safe and responsible AI in Australia consultation,

> '[t]he pace of advancements in AI was also a catalyst for the recent AI Safety Summit (the summit) hosted by the United Kingdom (UK) in November 2023. At the summit, Australia joined the EU and 27 countries in signing the Bletchley Declaration, committing to international collaboration on AI safety testing and the building of risk-based frameworks across countries to ensure AI safety and transparency.'

SBS appreciate the Government's proactivity in relation to international approaches, including those mitigating AI risks.

Standalone AI legislation or regulations (similar to those in the European Union) are not necessarily required in Australia, as we already have relevant regulatory frameworks (they need updating, at least ten have been identified by the Government[16]), thus avoiding duplication and unnecessary layers of regulation.

Key suggestions relevant to policy or regulatory interventions in Australia:

In implementing AI regulatory approaches in the Australian context, the following—relevant to the news and media industry—should be taken into consideration.

- *Robust data governance should be established*

  AI systems should—by default—include options for users to opt out of training the systems (using the users' inputs).

- *Bias auditing, and correction procedures are required*

  Regularly auditing AI systems for bias and implementing correction procedures when biases are detected are vital. Tools and methodologies are being developed, and should be mandated

[15] According to IBM, 'AI hallucination is a phenomenon wherein a large language model (LLM)—often a generative AI chatbot or computer vision tool—perceives patterns or objects that are nonexistent or imperceptible to human observers, creating outputs that are nonsensical or altogether inaccurate'.

[16] Same as 1, the principal function of the SBS is to provide multilingual and multicultural broadcasting and digital media services that inform, educate and entertain all Australians and, in doing so, reflect Australia's multicultural society.

(e.g. via industry standards) to detect and mitigate bias in AI systems, and help them learn to correct their own bias. The onus should be on the AI service providers to ensure these standards are met, with appropriate enforcement mechanisms in support.

Relevant to the news and media industry, the mitigation work should involve using diverse and inclusive datasets, and multidisciplinary teams—for example, AI industry bodies, universities, news and media industry bodies, as well as UNESCO's Global AI Ethics and Governance Observatory which provides advice on navigating the intersection of AI, media, and ethics.[17] The mitigation will ensure that ethical, impartial and balanced approaches can be part of AI development, deployment, training, and use in the news and media industry.

- *Desirable elements of AI guardrails or frameworks for Australia's news and media industry*

  The guardrails or frameworks should require AI systems to disclose their data sources and decision making methodologies to address issues such as inaccuracies, mis- and disinformation, hallucinations and deepfakes, thereby helping media organisations identify reliable and trustworthy AI-generated or AI-assisted information or content. As outlined above, a positive outcome could include increased trust in news and media institutions.

  Clarity on the copyright status of generative AI informed by the work of human creators, through copyright licensing arrangements or appropriate fair dealing parameters—would provide guardrails and more certainty to copyright owners and publishers including media organisations. There should be a level of flexibility in this area that allow positive development and deployment of AI to flourish.

  Examples of relevant 'best practices' are already being adopted by some AI providers, such as Microsoft CoPilot in relation to disclosure of data sources, and by Generative AI by Getty Images in relation to copyright licensing arrangements.

- *Public literacy, awareness and education are essential*

  Increasing public awareness, literacy and education about AI and its implications is essential. This can help audiences understand and critically evaluate AI-generated or AI-assisted content. As outlined above, SBS would welcome Government collaboration and support in delivering this work for all Australians.

d. opportunities to adopt AI in ways that benefit citizens, the environment and/or economic growth, for example in health and climate management

The following are relevant to the news and media industry, including SBS.

- *Potential of AI to help address climate change and environmental management*

  This is significant in terms of analysing environmental changes or degradation, detecting patterns and accelerating decarbonisation.[18] Relevant to SBS, it has a strong sustainability strategy with an ambitious Net Zero target of 2045. If AI would provide efficiencies and oucomes in this area, SBS would be interested in exploring the potential use of AI to assist its corporate decarbonisation strategies.

- *Enhancing overall productivity*:

  As with other forms of automation before it, AI has the potential to dramatically increase efficiencies including by reducing the time taken to perform time-consuming, repetitive or technical tasks. In the news and media industry, this has a flow-on benefit to audiences/citizens, who would enjoy enhanced quality, speed, and scale of news and media content produced utilising the same or even reduced resources.

[17] See https://www.unesco.org/en/artificial-intelligence/recommendation-ethics
[18] https://www.weforum.org/agenda/2024/02/ai-combat-climate-change/#:~:text=The%20IKI%20Project%20uses%20AI,management%20systems%20and%20encouraging%20reforestation.

e. opportunities to foster a responsible AI industry in Australia

- *Australia should prioritise developing, attracting, and maintaining digital talents who can compete with those of other countries (including in relation to data security, among other important matters).*
- *Ongoing Government initiatives and funding are essential*

  SBS appreciates the Government's commitment and activities supporting responsible AI, including through the development of the Australian AI Ethics Principles and initiatives such as funding for the National Artificial Intelligence Centre and the Responsible AI Network, among other things.[19] These efforts should continue, and should be expanded to include comprehensive support for future research into ethical AI, the development of AI guardrails (or frameworks), and public engagement on AI matters—the latter of which could particularly leverage SBS's capabilities.

  The Government's efforts could also include support for AI innovation hubs and incubators. These efforts will, in turn, inform the guardrails or frameworks for AI development and deployment in Australia.

- *Relevant education and workforce training are important*

  Literacy, awareness and education in relation to AI, including about ethics, should be provided through education at all levels—from primary schools to professional development programs, to ready Australia for an AI-assisted economy. As outlined above, SBS would welcome further support from, and collaboration with Government, in delivering this work.

- *Ethical AI certification schemes could be explored*

  Introduction of certification programs, when entities meet industry standards or code(s) of practice for ethical AI, taking into account Australia's AI Ethics Principles, could help users including SBS identify AI providers which are in compliance with the above. This will help promote trust among consumers, including consumers of the news and media industry, and other stakeholders.

f. potential threats to democracy and trust in institutions from generative AI

SBS's response to term of reference ***b.*** explored in detail the risks and harms arising from the adoption of AI technologies, including bias, discrimination and error. In addition, the following risks or harms could potentially pose threats to democracy and trust in instutions.

- *Spread of mis- or disinformation, with accelerated speed and scale*

  (as discussed earlier, relevant to ***b.*** and ***c.***)

- *The potential of further shifting of 'power' to tech giants*

  AI could potentially concentrate market power in the hands of tech giants, including but not limited to Google, Meta, Microsoft, and Amazon, as examples. These large tech companies have vast amounts of data (the commercial power of which cannot be under-estimated) and significant control of AI's technological development, and could exert influence in relation to public policy as well as societal perspectives, on virtually any topic or matter—through content generated by, or with assistance of, their AI services. Given the inherent threats to open democracy and social cohesion, where this influence has existed in traditional media, there are long-established legal and regulatory frameworks to mitigate any undue influence. No such frameworks exist as regards AI despite its potential influence being far more pervasive than that of traditional media.

- *Blurring of lines between reality and deepfakes*

  AI-generated content is becoming increasingly sophisticated and convincing, raising concerns in relation to criminal activities, deepfakes, and manipulation.

[19] Examples can be seen in 'Generative AI guidance has been provided to public sector agencies in Australia', and 'Australian Government is taking steps to ensure ethical use of generative AI' sections of this September 2023 coverage by *TechRepublic*.

g. environmental impacts of AI technologies and opportunities for limiting and mitigating impacts

SBS has a strong sustainability strategy and is working to ensure that it can utilise AI in its operations responsibly without net negative environmental impacts. Three key areas of potential environmental challenges relevant to AI are outlined below.

- *Significant creation of e-waste*[20]
- *Significant water usage*

  This is due to the need for water to cool data centres, and in the manufacturing of hardware necessary to run AI.[21]

- *Significant and exponentially increasing energy usage*

  This includes the energy usage required to train large language models, and generate answers to AI queries. According to the International Energy Agency, the electricity consumed by data centres globally will more than double by 2026, to more than 1000 terawatt hours, an amount roughly equivalent to what Japan consumes annually.[22] By 2040, the Information Communications Technologies (ICT) industry is predicted to be responsible for 14% of global greenhouse gas emissions, increasing from 2-3% today, mainly due to data centres and communication networks to power AI.[23] Even if renewable energy were to be solely used to power AI, there needs to be a significant acceleration of the transition towards renewable energy infrastructure.[24, and 25] However, there are also reported shortages of minerals and materials required for the manufacturing of renewable energy components such as solar panels and wind turbines, compounding to the environmental challenges.[26] To effectively minimise environmental impacts, large AI service providers could be required to take measures to reduce their environmental impacts.

[20] https://www.datacenterdynamics.com/en/opinions/energy-and-e-waste-the-ai-tsunamis/
[21] An example report on significant water use in relation to AI can be seen here: https://theconversation.com/ais-excessive-water-consumption-threatens-to-drown-out-its-environmental-contributions-225854#:~:text=By%20comparison%2C%20Google's%20data%20centres,cost%20126%2C000%20litres%20of%20water.
[22] https://www.afr.com/technology/booming-ai-demand-threatens-global-electricity-supply-20240418-p5fkvp#:~:text=According%20to%20the%20International%20Energy,to%20what%20Japan%20consumes%20annually.
[23] https://www.researchgate.net/publication/322205565_Assessing_ICT_global_emissions_footprint_Trends_to_2040_recommendations#:~:text=Information%20and%20communications%20technology%20(ICT,%25%20by%202040%20%5B10%5D%20
[24] https://earth.org/the-green-dilemma-can-ai-fulfil-its-potential-without-harming-the-environment/
[25] https://www.allianz.com/en/economic_research/insights/publications/specials_fmo/decarbonizing-information-technologies.html#:~:text=But%20these%20benefits%20come%20at,of%20CO2%20emissions%20by%202030.
[26] https://www.iea.org/reports/energy-technology-perspectives-2023/clean-energy-supply-chains-vulnerabilities