

26 July 2023

**Government Consultation:
Response to *Safe and Responsible AI in Australia* Discussion Paper**

To Whom It May Concern:

The Digital Publishers Alliance (DPA) submits the attached paper in response to the *Safe and Responsible AI in Australia* Discussion Paper dated June 2023.

The DPA is a non-profit member association supporting, connecting and protecting the interests of digital-first independent Australian news publishers and their audiences. We represent over 160 leading media titles from over 50 of the leading independent digital publishers in Australia. The DPA has an interest in ensuring there is sufficient AI regulation to protect the rights of digital publishers, and that this regulation adequately addresses the use of online news content to train generative AI models. We have prepared this submission in conjunction with our lawyers, Marque Lawyers.

This paper addresses gaps in regulatory approaches, and responds to consultation question 2:

*What potential risks from AI are not covered by Australia's existing regulatory approaches?
Do you have suggestions for possible regulatory action to mitigate these risks?*

Please do not hesitate to contact us if you require any further information in relation to this submission.

Tim Duggan

Tim Duggan
Chairman, Digital Publishers Alliance
tim@thedpa.org.au