**Safe and responsible AI in Australia submission by Jacek Korneluk and Spektrumlab Pty Ltd**

Definitions

1. Do you agree with the definitions in this discussion paper? If not, what definitions do you prefer and why**? Yes, I agree. Nevertheless, the definition must be flexible and regularly updated considering how quick AI emerging and changing**.

Potential gaps in approaches

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?

**Considering a Singularity effect as a real option need be addressed. The risk of AI completely bypass humans in activities, judgements and actions is highly likely. Preventive actions and protocols should be prepared in advance. Also, the Paperclips Apocalypse and Squiggle Maximizer scenario should be considered. There is no guarantee that AI will follow the same metrics and values as Natural Intelligence.**

3. Are there any further non-regulatory initiatives the Australian Government could implement to support responsible AI practices in Australia? Please describe these and their benefits or impacts.

4. Do you have suggestions on coordination of AI governance across government? Please outline the goals that any coordination mechanisms could achieve and how they could influence the development and uptake of AI in Australia.

**Supporting professionals with real level of knowledge and multidisciplinary expertise in all affected domains is the best way to coordinate properly. No age discrimination.**

Responses suitable for Australia

5. Are there any governance measures being taken or considered by other countries (including any not discussed in this paper) that are relevant, adaptable and desirable for Australia?

Target areas

6. Should different approaches apply to public and private sector use of AI technologies? If so, how should the approaches differ?

**No, it would be a sort of discrimination or promotion of one of the sectors. Both should be measured by the same standards and metrics.**

7. How can the Australian Government further support responsible AI practices in its own agencies?

**Organise more sandboxes-based projects and hackathons activities combining agencies’ workforces, AI creators, AI users, lawyers, and policymakers. Keep relevant government people in constant loop with AI.**

8. In what circumstances are generic solutions to the risks of AI most valuable? And in what circumstances are technology-specific solutions better? Please provide some examples.

9. Given the importance of transparency across the AI lifecycle, please share your thoughts on:

a. where and when transparency will be most critical and valuable to mitigate potential AI risks and to improve public trust and confidence in AI?

**The more transparent the more trustworthy. Full AI lifecycle should be a clear box. From data collection, data analytics, data processing to training, finetuning and deploying. AI- Quality- Managements- systems (AIQMs) based on blockchain, should be fully transparent and obligatory**.

b. mandating transparency requirements across the private and public sectors, including how these requirements could be implemented.

10. Do you have suggestions for:

a. Whether any high-risk AI applications or technologies should be banned completely?

**No, I disagree. The high-risk AI applications with good value proposition should be allowed under strict supervision and tailored regulation safety.**

b. Criteria or requirements to identify AI applications or technologies that should be banned, and in which contexts?

11. What initiatives or government action can increase public trust in AI deployment to encourage more people to use AI?

**Proven quality and relevant education level represented by governments workforces and officials. Creation of jobs in government sector offered for people with proven skills and representing multiple industries fields and areas. Clear rules of jobs offering based on qualification in practical domain knowledge.**

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Implications and infrastructure

12. How would banning high-risk activities (like social scoring or facial recognition technology in certain circumstances) impact Australia’s tech sector and our trade and exports with other countries?

**It would attract investment, boost trade and export with openminded, democratic, and libertarian countries.**

13. What changes (if any) to Australian conformity infrastructure might be required to support assurance processes to mitigate against potential AI risks?

Risk-based approaches

14. Do you support a risk-based approach for addressing potential AI risks? If not, is there a better approach? **Yes, I support provided the risk is properly articulated and calculated.**

15. What do you see as the main benefits or limitations of a risk-based approach? How can any limitations be overcome?

**Better safe then sorry, prevention is better than cure. To strict regulations will discourage innovations and discovery. Allowing a development of interesting, valuable but risky initiatives in sealed environment and under controlled supervision may be beneficiary for a progress.**

16. Is a risk-based approach better suited to some sectors, AI applications or organisations than others based on organisation size, AI maturity and resources?

**All actors should be measured and treated equally.**

17. What elements should be in a risk-based approach for addressing potential AI risks? Do you support the elements presented in Attachment C?

**Yes, I do. Some more need to be considered and consistently updated. The risk of Humans losing control of AI actions based on AI-only decisions is paramount and must be eliminated.**

18. How can an AI risk-based approach be incorporated into existing assessment frameworks (like privacy) or risk management processes to streamline and reduce potential duplication?

19. How might a risk-based approach apply to general purpose AI systems, such as large language models (LLMs) or multimodal foundation models (MFMs)?

20. Should a risk-based approach for responsible AI be a voluntary or self-regulation tool or be mandated through regulation? And should it apply to:

a. public or private organisations or both?

b. developers or deployers or both?

**As per high-risk activity, all public and private organisations, developers and deployers should be treated equally and regulations should be mandatory.**