



Introduction

Adobe is pleased to submit this response to the public consultation on Australia's next National Cultural Policy.

Adobe's mission is to empower everyone to create. We build innovative platforms and tools that unleash creativity, productivity, and personalised customer experiences. As a global leader in creative software and AI-powered tools, Adobe has partnered with creators, governments, and education systems across the APAC region—including in Australia—for decades. Our platforms empower Australian artists, designers, filmmakers, and storytellers to express themselves, innovate, and reach global audiences.

We strongly support the continuation of Revive's five enduring pillars as the foundation for the new policy. Adobe's AI policy agenda—built on responsible innovation, creator empowerment, and driving adoption through access and trust—aligns directly with Revive's goals.

In particular, we share the policy's focus on protecting creative rights in the digital environment, supporting artists as workers, and ensuring a place for every story in an era of rapid technological change.

Adobe is committed to ensuring AI amplifies rather than undermines human creativity.

We stand ready to partner with the Australian Government to deliver a National Cultural Policy that safeguards creators, fosters sustainable careers, and positions Australia as a leader in the global creative economy.

We welcome further dialogue and thank you for the opportunity to contribute.



Adobe's Input to the new National Cultural Policy

Creativity is a fundamentally human trait, let's keep it that way. For more than four decades, Adobe has built tools that empower creativity. We believe AI can bring enormous economic opportunity and growth for everyone from individual creators and small businesses to the most iconic brands.

At Adobe, we see AI not as a replacement for the human imagination or human creativity, but as an amplifier, helping people dream bigger, build faster, and work smarter. AI has the power to supercharge human creativity or upend the very creative economy it depends on. The choices policymakers make now will determine whether AI fuels future economic growth or erodes the fundamental incentives of creative work.

As governments around the world, including Australia, shape cultural policy in the age of AI, a crucial voice must be amplified: that of creators. Adobe remains committed to protecting and empowering artists, and we bring our deep learnings and principles to this consultation to help ensure the new National Cultural Policy puts creators first.

Pillar 1: First Nations First

Adobe strongly supports the central placement of First Nations stories at the heart of Australia's arts and culture. In an era of rapid technological change, strong creator rights and practical mechanisms for control are essential to ensure First Nations creators maintain authority over their cultural expressions and intellectual property. AI is a modern tool for artistic expression, but it must not undermine the rights of creators.

Adobe's approach gives creators the ability to signal their preferences with respect to how their work is used in AI training through standardised technical tools such as Content Credentials. These act like a digital nutrition label for digital content – they are secure, tamper-evident metadata that travels with the work across platforms and can include information about the creator, how the content was made, and the creator's preferences regarding generative AI training and usage.

Content Credentials are built on the open C2PA standard, which Adobe promotes as a member of the Content Authenticity Initiative (CAI). Today the CAI has thousands of members committed to widespread adoption. By embedding provenance information directly into content, First Nations creators and cultural custodians can signal their preferences and protect their stories in the digital environment, preserving cultural integrity while innovation continues.

Pillar 2: A Place for Every Story

Reflecting the breadth of our stories and the contribution of all Australians as creators of culture requires democratising access to creative tools and building an AI-ready workforce. AI is transforming the workforce at an unprecedented pace, reshaping job roles and redefining required skills across every industry.

To prepare both the current workforce and the next generation, AI literacy and hands-on experience with emerging technologies must be embedded into curricula everywhere, not optional or reserved for a select few.

Adobe partners with governments and education systems across multiple jurisdictions through public-private initiatives and MOUs to expand access to responsible AI tools and training for students and educators. In Australia, this includes support for Creative Campus programs at institutions such as Swinburne University, RMIT, and Western Sydney University, where students gain free access to Adobe tools including generative AI features designed for creative expression.

Adobe's broader goal is to equip 30 million learners and teachers globally with AI literacy, content creation, and digital marketing skills through programs like Adobe Digital Academy and free access to Adobe Express for Education in qualifying K-12 settings. When students and teachers have access to the right AI tools, they can broaden their thinking, expand their perspectives, and unlock new forms of creativity.

This directly supports a place for every story by enabling local, place-based, and emerging voices, particularly those from diverse and regional communities, to participate fully in cultural creation and ensure Australia's cultural landscape reflects its rich diversity.

Pillar 3: Centrality of the Artist

This pillar is at the core of Adobe's global advocacy. We are committed to supporting the artist as a worker and celebrating artists as the creators of culture. Creators play a powerful role in fuelling the economy, but they are facing an erosion of control and credit in the age of AI.

Adobe believes creators must be given clear rights and meaningful control in three critical areas so they can thrive.

1. New tools need clear paths to protection

AI is a tool, not an author. Creators have always used new technologies to express themselves, just as a paintbrush, a chisel, or a camera transformed how art is made, AI is simply today's newest tool in the creator's toolkit.

Works created using AI tools should be eligible for copyright when there is meaningful human expression and creative judgment. The technology used should not determine eligibility; the human authorship behind it should.

There should be no rigid percentage test for how much of a work must be human-created versus AI-assisted—what matters is whether there is human creative direction at all. Even selecting, arranging, or compositing AI-generated elements involves creative judgment.

Without a clear, straightforward path for creators using AI to secure copyright, we risk slowing down the broader creative economy and stifling new forms of creative expression.

2. Protection against AI-driven impersonation

Beyond copyright, policymakers must address the misuse of AI to replicate an artist's distinctive identity or signature style for commercial gain and real market harm.

Adobe has long advocated for targeted anti-impersonation rights to protect artists from those that would use AI to commercially-mimic artists and hold bad actors accountable. These rights focus on deliberate, unauthorised 'style replicas' that are primarily designed through targeted prompts, fine-tuning, configuration, or marketing to imitate a specifically identified artist so closely that an ordinary observer would reasonably believe it was created by, authorised by, or materially derived from that artist.

Liability is intent-based, with clear exclusions for bona fide commentary, criticism, parody, satire, scholarship, research, teaching, historical/biographical uses, and news/public affairs. General-purpose AI and platforms receive safe-harbour protections including notice-and-takedown mechanisms.

This narrow right does not regulate training data, own ideas/genres, or impose monitoring duties, it simply prevents unfair commercial competition while preserving legitimate artistic influence.

3. Meaningful ways for creators to signal their preferences around AI training

Standardised technical tools such as Content Credentials give creators real control. Launched as a free web app in October 2024 (with public beta in April 2025), [Adobe Content Authenticity](#) allows any creator to attach durable, screenshot-proof metadata, which can, if the creator chooses, include verified identity, social media links, and a Generative AI Training and Usage Preference requesting that supported models not train on or use their content.

Content Credentials indicating that AI was used are automatically applied to assets generated with Adobe Firefly, and customisable Content Credentials are available in Photoshop, Lightroom, Premiere Pro, and more. They function as tamper-evident provenance that can show who made the work, what tools were used, and what edits were made. Adobe respects these tags, has integrated them with partners including

LinkedIn's Verified feature, and is driving industry-wide adoption through the CAI so that creator preferences will be recognised globally.

By embedding these protections and tools into cultural policy, Australia can ensure artists remain at the centre with sustainable careers and the ability to express preferences over the use of their work so they can thrive as AI becomes part of the creative process.

Pillar 4: Strong Cultural Infrastructure

Strong institutions that sustain our arts, culture, and heritage must be resilient, future-ready, and supported by proportionate, risk-based frameworks.

Adobe supports the use of established consumer protection, cybersecurity, and fraud laws to address AI-related risks rather than recreating entirely new regulatory structures. Governments should apply proportionate safeguards tied to demonstrated, real-world risk and use-case context, not blunt size thresholds or one-size-fits-all rules.

A large image-generating model may use significant compute but pose low risk, while a small model in a high-impact deployment may warrant more scrutiny. This approach, aligned with frameworks such as the NIST AI Risk Management Framework, ensures cultural institutions can adopt AI tools confidently without unnecessary compliance burdens.

Public-private partnerships play a vital role here and Adobe collaborates with governments and education systems to embed responsible AI tools within its products and services, helping institutions future-proof their operations while protecting creative assets and supporting sustainable careers for artists.

Pillar 5: Engaging the Audience

To ensure stories connect with people, locally, nationally, and globally, audiences must trust the authenticity of the content they encounter. In an AI era, provenance infrastructure is key to combating deepfakes, impersonation, and misinformation while fostering greater engagement with genuine Australian creative works.

Content Credentials and the open C2PA standard provide a scalable, technical solution: they attach verifiable origin and editing history to content without requiring new legislation for every format. Publishers and platforms can use this information to help consumers assess trustworthiness, while creators gain attribution and control.

Policies that promote AI literacy, through the kinds of K-12 and workforce programs Adobe supports and preserve access to creative tools will empower audiences to participate more fully in both live and digital cultural experiences.

When people have skills and access, adoption accelerates, driving economic growth, job creation, and deeper audience connection to Australian stories.

Conclusion

Adobe will never stop advocating for the creators who make our world more dynamic, colourful, and human.

By embedding creator-first protections—clear copyright paths for AI-assisted works with meaningful human expression, targeted anti-impersonation safeguards, practical tools like Content Credentials, and strong support for AI literacy and access—into the new National Cultural Policy, Australia can support sustainable careers for artists, drive responsible innovation, and ensure a vibrant cultural sector for generations to come.

We stand with creators and policymakers to build a future where AI supercharges human creativity and every story has its place.

Adobe thanks the Office for the Arts for this opportunity and looks forward to continued collaboration.