GENERATIVE-AI &

THE AUSTRALIAN ARTS

A National Cultural Policy Review Submission

by

AUSTRALIAN ASSOCIATION OF VOICE ACTORS

AAVA

INTRO

The rise of generative-AI has created anxiety and speculation over the future of the creative arts as a financially viabile and sustainable industry, not just in Australia but worldwide. These concerns also extend to the dilution and authenticity of unique cultures. These two concerns are directly related, as are the problems generative-AI technology poses to the arts and the effects it has on both a cultural and industrial level.

Although this submission is focused on The Centrality of the Artist, and maintaining a Strong Cultural Infrastructure, the notion of First Nations First should be considered as being negatively impacted by the reach of generative-AI.

Concerns have been expressed over the harms that generative-AI will have on Australia's unique culture, in particular First-Nations culture, given that the majority of data (content) used to train the offshore AI large language models (LLMs) is from the US and beyond. The foundation of AI-generated content is not only far from human, but also primarily non-Australian.

This submission will make the case for:

Recognition of the advertising industry's cultural importance –
Largely overlooked in conversations around culture, the advertising industry is a cultural touchstone for Australians, a greenhouse for nurturing creative talent, and a financial lifeline for creative Australia.

Mandatory Explicit Labelling of AI-generated content –
Explicit labelling as a disincentive to replace human Australian creative workers with AI-generated content, especially in locally produced advertising content.

Arts Funding that excludes AI-generated content –
Arts funding and government tax-breaks should not reward any production that utilises generative-AI in a significant way that leads to negative outcomes for Australian creatives.

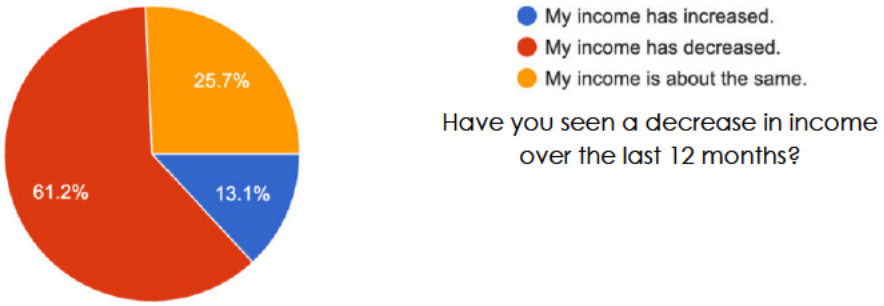
Explicit Copyright Framework –
Australian writers, artists, musicians and performers should have confidence that their intellectual property is safe from exploitation by AI-developers. AI-generated content should also not be afforded copyright status, and a system of compensation for those who have already has their content "scraped" should be established.

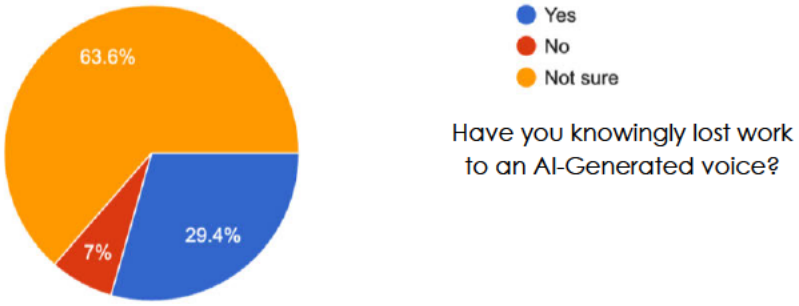
VOICE ACTORS – THE CANARY IN THE COAL MINE

For a yardstick of future harms to the creative industry caused by generative-AI, one need look no further than generative-AI's impact on the voice acting industry. Generative-AI has already caused great damage to the earning capacity of voice actors and voice artists over the last few years.

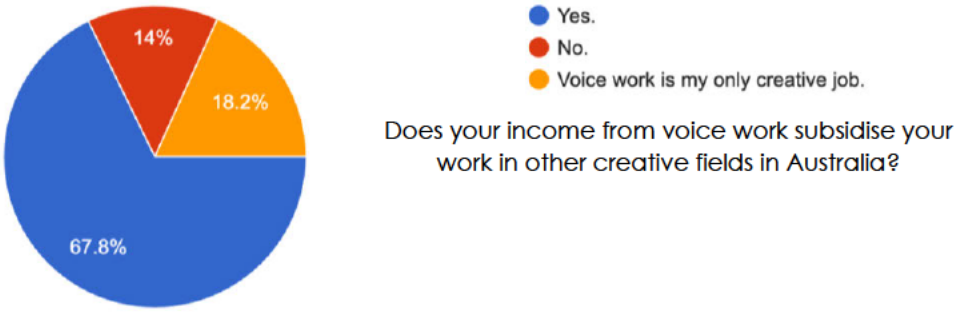
AI voices as a replacement for human performers has been on a sharp increase for the past three years. A recently completed survey of the local voice acting community by the Australian Association Voice of Actors (AAVA) produced the following statistics.

In the past 12 months **61.2% of voice actors have seen a decrease in income**, and **28.7% of voice actors have knowingly lost work to an AI-generated voice.**





66.7% of voice actors use voiceover work to **subsidise their work in other artistic fields**, whereas **19%** site voiceover work as their **only job** in the creative arts. This second statistic alone should be enough to realise how important the voice acting industry is for sustaining the careers of many performing artists in Australia.



As a result of generative-AI's impact on the voice acting industry, a staggering **43.1% of voice actors** are now actively **looking to re-skill or seek work outside of the creative arts**. This indicates that a "thinning out" of Australia's creative sector is coming, leading to less diversity of voices and a narrower range of perspectives in story-telling.

Have you begun to actively look for work in other industries, or begun re-skilling, as a result of AI entering the industry?

As First Australians and Ethnic Minorities are typically overrepresented in lower socio-economic groups, it would be logical to suggest that these voices would become further under-represented as financial pressures force these participants to other industries.

The increased use of AI-generated voices as a replacement for human performance has two primary negative outcomes;

- Taking work away from the current cohort, leading to financial stress/hardship.
- Creates a closed-door environment for new talent hoping to enter the industry.

ADVERTISING - A FINANCIAL LIFELINE FOR CREATIVE AUSTRALIANS

According to a 2023 Deloitte Access Economics report, *Advertising Pays,* Advertising contributes $53 billion to the Australian Economy, employing 153,400 Australians both directly and indirectly.

The largest commercial use of generative-AI in Australia is currently seen in the advertising industry. National brands, with large budgets (and profits) such as *Myer, Bankwest, Amaysim, The Melbourne Royal Show* and *Ladbrokes* have already started using AI-generated "actors", images, video, music, and/or voiceovers in recent campaigns.

The result of replacing dozens of creative workers – cast, crew and supporting adjacent small businesses that might usually be employed to produce a TV commercial – with generative-AI means that these Australian creatives lose work, draw no income, and pay no tax.

The following is a list of workers who would typically work on a TV commercial shot in Australia, all of whom would lose work when a TV commercial is produced using generative-AI.

Director	Assistant Editor	Casting Coordinator
Assistant Director (1st)	Audio Recordist	Actors (numerous)
Assistant Director (2nd)	Best Boy (electrician)	Actors' Agents
Cinematographer	Boom Operator	Catering Company
1st Assistant Camera	Studio Manager	Video Colourist
2nd Assistant Camera	Casting Director	Composer
Art Dept Coordinator	Assistant Casting Director	Concept Artist
Editor	Casting Associate	Construction Coordinator
Sound Designer	Line Producer	Costumer
Steadicam Operator	Location Manager	Data Wrangler
Still Photographer	Location Scout	Dolly Grip
Talent Booker	Makeup Artist	Field Producer
Transportation / Drivers	Prop Master	Gaffer
Travel Coordinator	Runner	Grip
Video Editor	Set Medic/Nurse	Hair Stylist
Wardrobe Assistant	Sound Assistant	Lighting Design
Voice Actor	Audio Studio	Voice Agent
Intimacy Coordinator	Driver	Contract Lawer
On-set Security	Dramaturg	Composer

The above workforce might typically work on several of the various TV commercials made in Australia each month, compared to the relatively low number of feature films or TV series. This means that **the advertising industry plays a key role in supporting the livelihoods of creatives** in Australia; it provides the work to sustain crew, performers, and the industry at large between shooting the next *Pricilla Queen of the Desert*, *Mad Max, Narrow Road To The Deep North*, or *Mr Inbetween*.

Commercials created with generative-AI technology also means that what we see on screen and hear on the radio is no longer a true reflection of Australia, but simply an output from an offshore tech company's AI-algorithm, trained on stolen copyright.

The support the advertising industry provides to Australian storytellers, film crews and performers cannot be understated. It provides pathways and training grounds for long-term careers, stability for the cultural and creative workforce, and for some it means not needing to hold multiple jobs just to survive.

Many of Australia's current crop of successful voice artists learned their craft on work that the industry might see as "low end" or "cheap" work, such as regional radio, internal corporate videos, e-learning and messages on hold. Many of these jobs have now been lost to generative-AI already with mainstream "high end" advertising work produced by ad agencies for multi-million-dollar brands now following suit.

This is why advertising plays an important and often forgotten part in Australia's cultural landscape and creative industry.

ADVERTISING - A CULTURAL TOUCHSTONE & GREENHOUSE FOR AUSTRALIAN CREATIVES

It is important to acknowledge that Australian-made advertising speaks to Australian culture in a way that can be as important to some as narrative drama or comedy. The phrase *"Not happy, Jan"* or *"Keep your eyes on the road, Rhonda!"* have cultural significance to Australians and it would be ignorant at best, elitest at worst, to suggest they didn't.

In the case of the *AAMI Ketut and Rhonda commercials*, this campaign helped Australia welcome actor Mandy McElhinney into their homes. Thanks to the profile *Rhonda* afforded Mandy, she went on to star in TV shows such as House of Hancock, Paper Giants, and Love Child.

Numerous creative Australians, including film directors, crew and actors got their start working in advertising.

Some familiar names who count advertising as their first professional bookings as actors are Naomi Watts, Isla Fisher, Angus Sampson, Conrad Coleby, Jackie Weaver, and Simon Baker. Although he was already a successful TV comedian in his own right, a strong case could be made that Paul Hogan's iconic film *Crocodile Dundee* wouldn't have achieved the same international success without the profile Paul Hogan's *"Shrimp on the Barbie"* tourism campaign brought to him internationally.

Acclaimed Australian film directors who started out directing TV advertising campaigns include Fred Schepisi (The Devil's Playground, Six Degrees of Separation), Bruce Beresford (Driving Miss Daisy, Breaker Morant, Mao's Last Dancer), Ray Lawrence (Lantana, Bliss), Craig Gillespie (I Tonya, Lars and the Real Girl, Cruella) and Michael Gracey (The Greatest Showman, Better Man).

Locally produced advertising campaigns that employ Australian creative workers, both on and off screen, should be encouraged and the use of Generative-AI to replace human creatives should be disincentivised.

Although commercially driven, Australian advertising still portrays uniquely Australian ideas and experiences and is a place for artists to hone their craft without the requirement to hold down multiple jobs. The advertising industry helps creatives to stave off career insecurity and cope with the seasonality of the creative arts.

MANDATORY LABELLING – PROTECTION FOR THE ARTS AND THE PUBLIC

In Creative Australia's *Review of AI and the Australian Consumer Law* (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 typically practising as sole practitioners or as part of small businesses and Generative AI (Gen AI) products and services cause harm to them."

THRESHOLDS & PRINCIPLES FOR LABELLING

The threshold:

> *Disclosure (at the time of consumption or broadcast) is required when a reasonable consumer could believe the media content is real or human produced.*

Unlike other advertising T&Cs or disclaimers (gambling or financial products) where an audible and/or visible disclaimer follows a commercial, content produced with AI-generated content should be disclosed **preceding**, and where possible, **during** the commercial at the time of broadcast/delivery.

For sight impaired people, audible labelling is essential for accessibility. For the hearing impaired, visual labelling is essential. This is why both should be employed where possible.

The key principle:

> *Immediate Consumer Recognition.*

Disclosures must be:

- clear
- prominent
- unavoidable
- understandable

This standard is already used in Australian advertising transparency rules.

Disclosures should apply across all media:

- TV and radio
- social media
- digital display ads
- influencer marketing
- print advertising
- advertorial journalism

IMPLEMENTATION OF AI LABELLING

Taken from *Article 50 of the European AI Act*, the following table explains the practical examples of explicit time-of-broadcast/consumption labelling that would help with *Immediate Consumer Recognition* of AI-generated content.

Format	Disclosure requirement
Images	Visible label or icon.
Video	Persistent icon + opening notice.
Audio	Audible disclosure.
Text	Clear statement of AI-generated origins.

MANDATORY AI LABELLING LAWS IN OTHER REGIONS

Vietnam:

Effective March 1st 2026, Vietnam's 2025 Law on Artificial Intelligence, No. 134/2025/QH15 mandates that every asset created or edited by AI that mimics real people must carry a clear label that is readable by humans and machines.

China:

As of September 1, 2025, China's *Measures for Labelling of AI-Generated Synthetic Content* enforces strict regulations requiring all AI-generated content, including images, audio, and video, to be labelled (visibly and invisibly) with specific requirements for platforms like WeChat and Weibo. Users uploading AI-generated content to online platforms are required to actively declare and use the labelling function provided by the platform.

European Union (EU):

Under the EU AI Act (effective from 2026/2027), article 50 states that providers of Artificial Intelligence systems that generate or manipulate content must mark their outputs in a machine-readable format.

Spain:

Following the EU AI Act, Spain's government approved a draft bill, the *AI Labelling Bill (2025)*, requiring explicit labelling of AI-generated content, with high penalties for non-compliance. The proposed regulations mandate that the use of AI be disclosed clearly and in a way that is accessible and understandable to any user, regardless of their technical knowledge or digital literacy.

United States (California):

The California AI Transparency Act (SB 942) effective Jan 1, 2026, mandates that AI providers allow users to detect if content was AI-generated, with requirements for "indistinguishable" labels. In addition, California Assembly Bill 853 (AB 853), known as the California AI Transparency Act and signed into law on October 13, 2025, amends and strengthens previous legislation (SB 942) to create a comprehensive framework for identifying AI-generated content.

India:

The government has proposed amendments to the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules (2021), which would require strict, mandatory labelling for AI-generated content to combat deepfakes and misinformation, including a "quantifiable visibility standard".

South Korea:
The AI Basic Act (Article 31) requires the labelling of AI-generated images and videos. Key provisions of the act aim to “establish a foundation for trustworthiness in AI society, thereby protecting the Rights and Interests of the People and their dignity, contributing to improving the quality of life of the people, and enhancing national competitiveness.”

OVERSIGHT & REGULATORY BODIES IN AUSTRALIA

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, albeit with an additional, consistent and specific focus on AI transparency.

The following codes of practice, which currently must be registered by the ACMA, would be suited to additions that cover mandatory at-time-of-broadcast labelling of AI-generated content:

- 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

The mechanisms for implementation and oversight of Generative-AI Transparency already exist in Australia:

- **The Australian Communications and Media Authority** (ACMA) would be the appropriate body to oversee the adequate drafting and application of a generative-AI policy and codes of practice for the existing bodies that govern advertising and broadcasting in Australia.
- **The Australian Competition & Consumer Commission** (ACCC) already informs much of what the Australian Association of National Advertisers (AANA) covers in its Advertising Code of Ethics. The simple addition of AI-transparency in advertising to its remit would be a logical step forward to meet new technologies.

- **The e-Safety Commissioner** already exists to govern issues relating to online abuse and safety.

However, both ACMA and the self-governing bodies that report to it have shown little desire to be proactive or prescriptive and have not been receptive to AAVA's suggestions for strong transparency measures.

An over-haul of ACMA's mandate, mission, and scope of powers is well overdue to bring it in line with the rise of AI technology. Access to ACMA by tech companies and broadcast companies also needs to be limited and monitored with transparency.

At this stage it is evident that ACMA, the ACCC, and the e-Safety Commissioner do not have a clear direction or mandate to prescribe explicit transparency of AI-generated content. A consistent and considered AI policy across the bodies is overdue.

COMMERCIAL RADIO – SELF REGULATION FAILURE

Recent actions by Commercial Radio & Audio (CRA) have shown that industry-driven solutions may lean towards favouring AI. On May 8th, 2025, AAVA made a submission to the Commercial Radio & Audio (CRA) review of the Commercial Radio Code of Practice. We included many of the labelling and transparency recommendations outlined in this document.

On May 22nd, 2025, AAVA met with the leadership team at CRA to discuss the need for explicit transparency regarding the use of AI-generated content – particularly AI-voices. CRA were reluctant to be "prescriptive" in their code of practice. On June 3rd, 2025, AAVA met with the Australian Communications and Media Authority (ACMA) to highlight the importance of explicit labelling and real-time disclosure of AI-generated content on air.

On February 10th, 2026, CRA (Commercial Radio and Audio Australia) released their updated Commercial Radio Code of Practice, with approval by ACMA. The new CRA Code can be read at Commercial Radio & Audio's website. CRA have included a section (section 11) pertaining to "AI Transparency", but what has been added now allows broadcasters to use AI-generated audio with very little and no requirement for time-of-broadcast disclosure.

CRA's code exempts the following from their minimal AI-transparency measures:

- Commercial content
- Music
- Emergency information
- Weather
- Traffic Reports
- Any programming without regularly scheduled airtime.

The bare-minimum required under the new code of practice is for the broadcaster to disclose the uses of AI-generated content on the station's website or social media feed, not when the AI-generated content is aired.

Clearly **self-regulation by industry does not work**, when an organisation such as CRA, whose members are also the media companies that profit from replacing its human workforce with AI-generated voices, gets to write its own rules.

ACMA has shown no leadership by allowing these weak and insufficient measures to suffice as “transparency”, furthermore the **conflict of interest** that sees media companies write their own rules via a proxy such as CRA needs further scrutiny by the independent regulator.

ARTS FUNDING & TAX BREAKS

Arts funding bodies should continue to affirm the principle that artists should be paid for their work, award coverage and minimum standards in the arts sector are upheld, and grants should have an AI proviso that if generative-AI is to be used in a project, the effect of human job losses should be spelt out in the application and a funding ceiling be applied, to promote human involvement over AI.

There is no ‘Centrality’ of an artistic industry when AI is allowed to be used carte blanch. The centre cannot help but move to an outer part of the artistic circle as the core belief that ‘humans create art and art cannot exist without humans’ is changed by mass computer input. Productions that significantly use generative-AI technology rather than human talent/labour should be ineligible for government subsidies and creative grants.

COPYRIGHT & COMPENSATION

The Government has recently committed to protecting the copyright of Australian creators from exploitation by AI developers. AAVA would like to see explicit language added to Australia’s copyright laws to further protect the intellectual property of Australian creative artists and remove any ambiguity that data-scraping comes at a palpable cost.

The financial impost to an individual trying to prosecute a civil case already seems like an impossible task. Put simply, most writers, actors, musicians and artists cannot afford to sue a multi-billion-dollar AI company for stealing their IP.

Furthermore, investigating a breach and forcing discovery would be very difficult given the secrecy and uncooperative nature of AI developers. The more ambiguity in the law the harder this is. Maintaining a strong and clear copyright framework that works in concert with other legal and policy mechanisms is essential for the arts community moving forward.

Clear “opt in” rules around AI training data should become the gold standard in Australia so that the onus is on AI developers to seek consent from the copyright owner and offer appropriate compensation. Forcing AI developers to divulge what copyright works have

already been used to train their systems would open the possibility of creating a licencing compensation scheme along similar lines to the Australian Lending Right Scheme.

CONCLUSION

Regulation mandating the explicit labelling of AI-generated content will serve as a disincentive to replacing human Australian creative workers with AI-generated content. In no place will this be truer than in the advertising industry which is has been a leading employer of Australian creative artists. Putting human performers and creators first should be an absolute priority for the Australian Government.

Locally produced advertising content has long been overlooked as an important training ground for workers in the creative sector, and importantly a foundation of financial support for creative Australians of all disciplines. If mandatory labelling of AI-generated content will save jobs in this multi-million-dollar sector, then the government should act and not rely on self-regulation by industry bodies such as CRA or FreeTV which too often falls short.

An important part of mandating AI-transparency is allowing the public to know, in real time, when media purporting to be human-made is not. Giving the public the ability to know when they are engaging with AI-generated content is a basic principle of the Australian Department of Industry Science & Resources' very own voluntary AI Ethics Principles:

> *"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."*

Australians should get to choose whether they engage with AI-generated or not. They should have the tools and ability to decide when to trust content and when not to. And, they deserve to know when a media outlet or public facing brand has opted to bypass hiring a human. Australians, just as many other countries have now done, deserve the right to know the origins of what they are consuming.

When the main argument for using generative-AI technology as a replacement for human workforce is often touted as a cost saving and scalability benefit, questions should always be asked. Australian taxpayer dollars should never subsidise companies that bypass Australian workers.

Arts funding bodies should not reward grants to any production that utilises generative-AI in a way that leads to negative outcomes or job losses for Australian creatives. Likewise, Australian, and/or State Government tax-breaks for film/TV productions should not be given to any production that utilises generative-AI in a way that leads to negative outcomes or job losses for Australian creatives.

Australian writers, artists, musicians and performers should be compensated for the use of their intellectual property to train an AI system, especially when that system seeks to compete with them commercially.

Australian creatives should be legally protected from having their intellectual property exploited by AI-developers without their consent or compensation, and AI-generated content should also not be afforded any copyright status.

The submission was prepared by Australian Association of Voice Actors (AAVA). 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, Suppliers of Audio Gear, and Studios.

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

For further consultation:

Simon Kennedy - AAVA President
[redacted]

Teresa Lim - AAVA Vice President
[redacted]

Cecelia Ramsdale – AAVA Secretary
[redacted]