

National Cultural Policy Revive 2.0 Review Submission

Submitted by: Adelaide Contemporary Experimental (ACE)

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To: Committee Secretary, Senate Standing Committees on Environment and Communications

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Executive Summary

Adelaide Contemporary Experimental (ACE) welcomes the opportunity to provide this submission to the Australian Government's Review of the Revive National Cultural Policy. As a proud member of Contemporary Arts Organisations Australia (CAOA), a national network of 15 independent, public, not-for-profit, small-to-medium (S2M) contemporary visual arts organisations, ACE stands as the leader of contemporary and experimental artistic practice in South Australia.

While the initial implementation of Revive successfully established structures like Creative Workplaces, the visual arts, and specifically its foundational S2M organisations, remain largely under-recognised and under-resourced within the policy's primary funding delivery mechanisms. S2M organisations are the engine room of the Australian art ecosystem; we represent the primary site for artistic research, risk-bearing experimentation, and the first critical income stream for most living artists.

To correct structural funding imbalances and secure a sustainable future for Australian contemporary visual arts, ACE urges the government to strengthen the S2M infrastructure. This submission echoes CAOAs' overarching policy goals while addressing specific critical interventions across Revive's five core pillars, including urgent visual arts tax reforms, ethical AI guardrails, and formalised frameworks for cross-portfolio investment in health, education, and social cohesion.

ACE

About ACE

At ACE, we are dedicated to giving artists and their groundbreaking ideas a platform. This mission, and our unique approach to filtering global artistic dialogues through a distinctively local prism, define who we are today. Our commitment to working with individuals and communities ensures our relationships with artists, audiences, and the broader sector are transformative, not transactional. We exist to transform artists' careers and enhance the experience for audiences: we create space for experimentation, generate creative inclusion, and expand ideas about what art and artists are, and can be.

This strong contemporary focus is built on a significant historical foundation. ACE was established in 2017 through the merger of two highly influential South Australian arts organisations: the Experimental Art Foundation (EAF) and the Contemporary Art Centre of South Australia (CACSA). This merger entwined more than a century of combined experience in fostering innovative and experimental art. By uniting their strengths, ACE was born, allowing for a sustained and vital contribution to the contemporary visual arts landscape in South Australia. We proudly continue the spirit of experimentation and critical engagement that defined EAF and CACSA, channeling their enduring legacies into our vibrant program for today and the future.

Summary of Key Recommendations:

1. Establishment of a Visual Arts Council: Statutorily enshrine expert strategic support, representation, and targeted funding for the S2M visual arts sector within Creative Australia.
2. Expansion of Multi-Year Operational Funding: Inject indexed investment into a renewed Visual Arts, Craft and Design Framework (VACDF) and the Four-Year Investment for Organisations (FYIO) funding program to reinforce cultural infrastructure and artist livelihoods.
3. Equitable Tax Reform for Artists and Arts Workers: Deliver systemic changes to personal income tax, GST averaging, and Fringe Benefits Tax (FBT) exemptions to alleviate severe financial precarity across the sector, while also recognising the vital role the sector plays as a societal good.
4. Comprehensive Ethical AI and Copyright Frameworks: Safeguard artists' intellectual property, moral rights, and First Nations cultural sovereignty from unremunerated generative AI training.
5. Cross-Portfolio Arts Integration: Formalise and fund inter-departmental frameworks linking the S2M visual arts sector to broader healthcare, public education, and regional community wellbeing outcomes.

Addressing the Five Pillars: Challenges & Opportunities

Pillar 1: First Nations First

- **The S2M Reality:** S2M organisations like ACE consistently outperform larger cultural institutions and the commercial sector by deeply embedding First Nations leadership, hosting culturally safe creative spaces, and bringing speculative, independent Indigenous practices to public visibility and critical recognition.
- **The Gaps in Revive:** While Revive initially focused heavily on establishing frameworks for the First Nations performing arts sector, additional targeted investment is urgently required to support First Nations visual artists, craft practitioners, and independent curators.
- **ACE's Call to Action:** We request a substantial expansion of the Revive framework to increase targeted funding for First Nations-led visual arts programming and projects, ensuring that First Nations storytelling is supported across all artistic mediums in an ambitious, enduring, and self-determined manner.

Pillar 2: A Place for Every Story

- **The S2M Reality:** S2M spaces are uniquely accessible, offering free entry, diverse programming, and local community partnerships that elevate culturally diverse, regional, and underrepresented voices. CAO data indicates that over 60% of our network's artistic cohort and workforce identify as First Nations, CALD, CaRM, LGBTQI+, or young people. Rather than creating new top-down government programmes to generate diverse stories, the policy imperative must be to fund the existing grassroots structures already delivering these outcomes.
- **ACE's Call to Action:** Secure consistent, multi-year operational funding for the S2M sector via Creative Australia. Increasing indexed investment directly into localised infrastructure guarantees that a wider spectrum of Australian communities see their lived experiences validated and documented in real-time.

Pillar 3: Centrality of the Artist

- **The S2M Reality:** Research demonstrates profound economic precarity in our sector, with the average income from visual arts practice sitting at just \$23,600 per year (well below the poverty line). S2M organisations act as vital conduits for survival, collectively investing 32% of their annual turnover (\$5.6 million) directly into artists via commissioning and presentation fees. However, static operational funding over

Adelaide Contemporary Experimental

the past decade (2015–2025) has severely eroded our capacity to keep pace with inflation and fair-pay standards.

- **ACE's Call to Action for Critical Tax Reforms:** To genuinely uphold the centrality of the artist, the federal government must look beyond funding grants and enact systemic economic policy alignment:
 - **Tax Exemptions for Prizes and Grants:** Exempt all competitive art prizes, fellowships, and government grants from personal income tax. Under current rules, a successful year can trigger sudden tax debts and HECS/HELP repayments, rendering an artist financially worse off for achieving career milestones.
 - **GST and HECS/HELP Income Averaging:** Implement a five-year rolling average for the \$75,000 GST threshold, and calculate HECS repayments based on multi-year consecutive income averages to cushion the impact of irregular, one-off commission or prize spikes.
 - **Non-Commercial Loss (NCL) Exemptions:** Fully exempt professional artists who meet the ATO's TR 2005/1 in business test from NCL provisions, removing outdated non-arts income caps that penalise artists who teach or work casual jobs to support their practice.

Pillar 4: Strong Cultural Infrastructure

- **The S2M Reality:** Strong cultural infrastructure cannot focus strictly on major collecting institutions or large-scale capital works projects. A healthy ecosystem requires a well-supported network of smaller organisations that train the workforce, foster regional audience pipelines, and absorb the financial risks of experimental art production. S2M organisations operate with exceptional efficiency, yet are under immense structural strain from rising governance costs, compliance demands, and overheads.
- **ACE's Call to Action for Institutional Sustainability:**
 - **Fringe Benefits Tax (FBT) Exemptions:** Enact FBT exemptions specifically for S2M arts organisations to ease pressure on wage growth and enhance employee retention.
 - **Philanthropic Incentives:** Enhance taxation incentives for arts philanthropy to 125% as recommended by the Myer Enquiry, unlocking vital private capital.
 - **Federal Funding Matching:** Introduce a federal commitment to match state-level visual arts sector operational funding as a fundamental principle of a renewed VACDF.

Pillar 5: Engaging the Audience (and Embedding Public Impact)

- **The S2M Reality:** S2M visual arts organisations welcome over 1 million people annually through completely free-entry exhibitions, public education, and community programming. We drive local cultural tourism and international cultural diplomacy. However, current Revive settings under-utilise our sector's potential to affect wider societal health, learning, and civic wellbeing.
- **ACE's Call to Action for Cross-Portfolio Impact & Emerging Tech:**
 - **Cross-Portfolio Funding:** Establish dedicated, multi-agency funding lines connecting the Office for the Arts with the Portfolios of Health and Aged Care, and Education. Targeted investment will allow visual arts organisations to scale specialised initiatives for social cohesion, mental health, and lifelong public learning.
 - **International Mobility Measures:** Provide dedicated federal investment in S2M-led international exchanges, residencies, and biennale participations to cultivate global markets for Australian creators.
 - **Safeguards Against Unregulated AI:** To ensure technology supports rather than undermines creative livelihoods, the government must institute a mandatory opt-in model for generative AI training datasets. We support introducing a targeted levy on AI suppliers to fund a collective licensing framework and remuneration scheme for artists whose works are scraped, alongside strict legal mechanisms to protect First Nations intellectual property from unauthorised digital reproduction.

Conclusion

Adelaide Contemporary Experimental and the broader CAO network represent irreplaceable national infrastructure. Investing in the operational sustainability of the small-to-medium visual arts sector is the single most efficient way for the federal government to drive direct economic returns to living creators, protect cultural diversity, and engage diverse communities.

Revive 2.0 presents a vital opportunity to rectify a decade of static funding and outdated fiscal frameworks. By establishing a dedicated Visual Arts Council, expanding indexed multi-year multi-level funding, and rolling out targeted tax and AI regulations, the Australian Government can ensure a truly resilient, equitable, and globally connected cultural future.