screenrights

Submission in response to Productivity Commission Interim Report of 5 August 2025
Harnessing data and digital technology

12 September 2025

About Us

1. Screenrights is a non-profit copyright management organisation representing the screen production sector. Screenrights has more than 5,200 members in 73 countries worldwide. Our members are producers, writers, visual artists, directors, sales agents, broadcasters and distributors.

2. Screenrights is appointed by the Commonwealth and the Copyright Tribunal to administer several licensing schemes on behalf of filmmakers. The licences include educational use of broadcasts, retransmission of free-to-air broadcasts and government use of broadcasts. Screenrights collects the fees for the use and distributes them to the copyright owners of the programs used.

3. In the 2024/25 financial year, Screenrights made available $43.5 million for distribution to Screenrights members payable to our members under all our statutory licence and other services.

4. Screenrights also administers a licensing scheme in New Zealand, which includes educational licences.

5. Supporting the integrity of copyright in a fast-changing digital environment and supporting our members' right to fair compensation for the usage of their creative material is a fundamental objective for Screenrights.

Overview

6. Screenrights welcomes the opportunity to respond to the *Harnessing data and digital technology* Interim Report issued by the Productivity Commission (**PC**) on 5 August 2025 (**Interim Report**).

7. The Interim Report addresses four areas for potential reform:

    (a) Artificial intelligence (**AI**), in relation to copyright;

    (b) Data access;

    (c) Privacy regulation; and

    (d) Digital financial reporting.

    In this submission, Screenrights restricts its comments to AI and copyright as addressed in Chapter 1 of the Interim Report.

8. Screenrights supports the efforts of the PC to address constructively the interaction between AI and copyright laws in Australia. Screenrights also supports a policy framework that facilitates innovation and the potential increases in productivity that may be gained through new technologies such as AI. However, Screenrights urges the Government to avoid an approach that weakens existing copyright protections and undermines the financial viability, security and stability of Australia's creative industries.

9. In response to the AI and copyright matters considered in Chapter 1 of the Interim Report, including Information Request 1.1, Screenrights' position is as follows:

    (a) **No TDM exception:** Screenrights strongly opposes a text and data mining exception (**TDM exception**) to copyright for AI; and also strongly opposes any rushed broad-brush amendment to Australia's copyright framework;

    (b) **Enhanced copyright licensing is the way forward:** Many Australian copyright owners are interested in licensing their material for AI development[1]. Government policy should focus on

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[1] For example, Australian Creators Welcome Establishment of Copyright and AI Reference Group | Screenrights; Pioneering copyright licence mitigates AI risk flying under the radar; AI and Music: local and international developments

supporting and facilitating such licensing activities by removing obstacles to licensing and creating structures to support licensing. This will benefit Australian creators and facilitate AI development in Australia.

(c) **Impose appropriate transparency obligations on AI models:** Screenrights urges the Government to establish a compulsory framework of transparency obligations for AI developers in relation to text and data inputs for AI, including generative AI. The obligations would not apply where the AI developer owned or had licensed the input content. This will enable effective copyright licensing, as well as appropriate data access and privacy consents. It will also create certainty for Australian businesses that the AI technologies they adopt are operating within Australian laws.

10. In summary, Screenrights submits that the introduction of a TDM exception, or even a do-nothing approach where AI developers continue to operate without transparency and without assistance or incentives to license, would be significantly damaging to Australia's creative sector and to Australia's productivity in the long term.

Detailed submissions

No TDM Exception

11. Screenrights strongly opposes the introduction of a TDM exception for AI to Australia's copyright law fair dealing framework for the following reasons:

(a) **Not clarifying a grey area; legalising unapologetic infringement:** In the view of Screenrights, generative AI developers unquestionably <u>do</u> infringe copyright when unlicensed text and data mining, i.e. ingestion of unlicensed copyright material by AI models, occurs. On page 27, the Interim Report quotes a 2013 Australian Law Reform Commission report to the effect that "[t]here has been growing recognition that data and text mining should not be infringement because it is a 'non expressive' use." That is wrong. Whether that was a defensible position even twelve years ago when generative AI was unknown, is arguable. We submit that the opposite is true now. In different jurisdictions around the world, TDM for generative AI is being recognised as wholesale copying and potentially expressive use of copyrighted materials[2]. TDM by large AI models for commercial purposes does not necessarily meet the restrictions of copyright exceptions in even the most permissive jurisdictions[3].

The enactment of a TDM exception in Australia would not be clearing up some lingering confusion about correct AI development practices; it would be endorsing the rapacious and unethical appropriation of copyrighted material from creators by trillion dollar transnational corporations[4] and encouraging those practices on Australian soil in a commercial environment where there appears to be no shortage of resources for other purposes. For example, Meta is willing and able to pay a single 24 year old AI researcher $250 million over 4 years[5] but apparently found it "unreasonably expensive[6]" to follow legitimate copyright licensing practices for authors' creative content used to train its generative AI model Llama 3.

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[2] In the US see pages 46 and 47 of the 9 May 2025 United States Copyright Office pre-publication report *Copyright and Artificial Intelligence Part 3: Generative AI Training* Copyright and Artificial Intelligence, Part 3: Generative AI Training Pre-Publication Version; In the EU, AI developers must respect opt-outs, can only use "lawfully accessed" material and TDM is defined as "any automated analytical technique aimed at analysing text and data in digital form in order to generate information", notably not for the purpose of creative expression. See pages 41 and 42 of 9 July 2025 JURI Committee study *Generative AI and Copyright - Training, Creation, Regulation.* Generative AI and Copyright - Training, Creation, Regulation | Think Tank | European Parliament

[3] In Japan, known as one of the more AI favourable jurisdictions, the "non-enjoyment" copyright exception under Article 30-4 of the *Copyright Act 1970* is being challenged in relation to its use for training generative AI. Three prominent media organisations Yomiuri Shimbun, Asahi Shimbun and Nikkei Inc have lodged lawsuits against Perplexity AI in relation to scraping their daily newspapers. This is particularly notable because Japan is a notoriously non-litigious jurisdiction: "General Understanding on AI and Copyright in Japan"; https://ventureinjapan.substack.com/p/perplexity-sued-labubus-and-markets

[4] Authors outraged to discover Meta used their pirated work to train its AI systems - ABC News

[5] Meta is paying a 24-year old AI researcher $250 million - echoing the dot-com bubble | Morningstar

[6] The Unbelievable Scale of AI's Pirated-Books Problem - The Atlantic

(b) **A TDM exception cannot be "fair" by definition**: The above point leads on to a second: the training of AI models necessarily involves copying of the whole of copyright materials, in large numbers, which are then exploited for commercial gain, often in competition with the original works. Even if a TDM "fair dealing" exception to copyright were implemented in Australia, it is difficult to see what practical parameters of "fairness", as set out in section 40(2) of the *Copyright Act 1968 (Cth)* and developed in Australian copyright caselaw, could be applied to such generative AI text and data mining of unlicensed copyrighted content. Meta's Llama 3 generative AI model is a useful example here. The US has a flexible "fair use" defence to copyright infringement as compared to purpose specific fair dealing exceptions in Australia, but the factors assessed in determining what is fair are similar. Meta was successful in contesting a suit for copyright infringement by authors of books used in text and data mining to train generative AI model Llama 3. The 27 June 2025 decision in *Kadrey v. Meta* in the United States District Court for the Northern District of California was in favour of Meta. However, in that decision, Judge Chhabria made it clear that this apparent victory was specific to the evidence submitted in court; stating that text and data mining for generative AI will usually not be fair use, if the plaintiffs provide the correct evidence:

In cases involving uses like Meta's, it seems like the plaintiffs will often win, at least where those cases have better-developed records on the market effects of the defendant's use. No matter how transformative LLM training may be, it's hard to imagine that it can be fair use to use copyrighted books to develop a tool to make billions or trillions of dollars while enabling the creation of a potentially endless stream of competing works that could significantly harm the market for those books. [emphasis added].[7]

(c) **TDM exceptions are not widespread and Australian copyright law is not out of step:**

   (i) Despite initially exploring TDM exceptions, Canada and the United Kingdom have both shelved proposals to legislate a commercial TDM exception. Push back in the United Kingdom has been particularly strong with high profile creators like Paul McCartney and Elton John lending their influence to oppose the introduction of a TDM exception.

   (ii) Neither India nor China has implemented a TDM exception.

   (iii) Hong Kong is considering a TDM exception, but with robust conditions, including that it will not apply if licensing is available for the copyrighted content instead.

   (iv) Jurisdictions like Singapore where TDM exceptions have been implemented have relatively small creative industries. Australia by contrast has a vibrant and world-renowned creative sector to protect.

   (v) Litigation against TDM by generative AI is widespread and ongoing[8], and the cases heard so far were early in the understanding of generative AI and with limited application. Better resourced and stronger cases are underway in multiple jurisdictions led by very large copyright owners including Disney, the New York Times and Getty Images, and Japanese media companies. AI developers may well be constrained from TDM in multiple jurisdictions over the coming months.

   (vi) As well as litigation, as noted above in paragraph 11(a) in some jurisdictions where TDM exceptions have been implemented, these are being narrowed by guidelines, policy statements and codes of conduct.

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[7] p. 39 Kadrey et al v. Meta Platforms, Inc., Case No. 3:23-cv-03417 (N.D. Cal.)
https://www.courthousenews.com/wp-content/uploads/2025/06/kadrey-et-al-vs-meta-defendant-order-partial-summary-judgment-dmca-claim.pdf
[8] Generative AI – IP cases and policy tracker | Mishcon de Reya

(d) **Any proposed change to copyright law needs thorough legal review, consultation and evaluation of impacts:** Screenrights submits that it is inconsistent for the Interim Report to say on pages 17-22 that there should be a go-slow on regulating AI generally, while gap analysis is undertaken, while at the same time rushing to introduce a TDM exception that will undermine copyright. In the view of Screenrights:

    (i) Rushed amendments to legislation are rarely good amendments to legislation.

    (ii) We should not be letting technology companies set the pace for any far-reaching legal amendments in Australia. Technology companies do not (and should not) dictate policy in Australia. We note the view of the Tech Council referenced at 11(h) below that "urgency" is required here, but we strongly disagree. AI is not going anywhere, and while there may be evidence of early adopters of technology gaining a head start and flourishing, there will be equally many cautionary tales about poorly thought out change management. In terms of urgency, it is worth noting that one of the reasons that Meta gave for not paying authors when it was training Llama 3 was that licensing was "incredibly slow" because they "take like 4+ weeks to deliver data"[9]. This unreasonable attitude to time frames mirrors the tech sector's disregard for proper policy consideration. Calls for urgency from the technology sector should be considered in this context.

(e) Screenrights submits that the Draft Recommendation 1.1 in the Interim Report which proposes a gap analysis of laws relevant to AI should include copyright laws, and that "the additional risk of harm posed by AI" should include the harm to creators who could lose their enforceable right to solely exercise copyright.

(f) **AI may bring productivity gains for Australia, a TDM exception will not change that:** The Interim Report on Page 1 states that "the economic potential of AI is clear". Screenrights broadly agrees. Screenrights and the screen industry recognise the potential benefits of AI and are already users of AI. Further it is clear that there is broad agreement that AI implementation will yield productivity gains for Australia (although predictions diverge wildly on how much and how soon[10]). However, there is no good quality evidence that AI developers, mostly based in the US and China, need unfettered access to Australian copyright material or the ability to pirate Australian content with impunity in order for those productivity gains to be realised by Australia and Australians. We note particularly:

    (i) There is no evidence that a permissive copyright regime will encourage investment in Australia by large AI developers. Training of foundation AI models (ChatGPT, Gemini, etc) will continue to take place in the home countries of the multinationals, not elsewhere, notwithstanding any change to copyright in Australia. Singapore, for example, has had for several years the most expansive copyright exceptions designed to attract tech sector investment, but no AI training is being conducted there.

    (ii) The sectors of the Australian economy identified by the Tech Council of Australia as being "poised to benefit" most from generative AI are "healthcare, manufacturing, retail, and professional and financial services"[11] We consider it unlikely that many, if any, of the businesses and institutions in those sectors will require generative AI to create poetry, novels, movies, music (to use some examples of creative material pirated by AI developers from internet sources) to realise productivity gains through generative AI. Instead for those sectors to utilise generative AI, AI developers will need direct access, supervised, licensed training on proprietary industry or government data sets.

    To use healthcare as an example: In 2022–23, Australian governments funded $178.7 billion

9 The Unbelievable Scale of AI's Pirated-Books Problem - The Atlantic
10 The Simple Macroeconomics of AI | MIT Economics; AI as Normal Technology | Knight First Amendment Institute; AI adoption could boost global GDP by an additional 15 percentage points by 2035, as global economy is reshaped: PwC Research
11 Generative AI could contribute $115 billion annually to Australia's economy by 2030

of the total health expenditure for Australians[12]. Healthcare is an area where many Australians anticipate exciting innovations with AI, and an area where AI has the potential to reduce cost while also optimising health outcomes, potentially allowing fuller engagement of a cohort of Australians in the workforce, which should drive productivity increases. However, we suggest that most of those AI innovations, if they come to pass, will come from AI learning on highly specific, heavily restricted data sets. Privacy and security of data will be the primary concerns, not copyright. It will not be necessary for generative AI models to pirate creative copyright material in order to find new drugs for fighting cancer.

(g) **Australia will not be left behind:** Screenrights rejects the message from the technology sector led by Google, Microsoft, OpenAI, Atlassian[13] and others that unless Australia introduces a TDM exception, Australia will miss out on the productivity gains and economic benefits from AI and be out of step with the rest of the world:

   (i) Technology companies are building data centres in Australia already[14], and this is to allow the serving of local customers at low cost. This will continue and copyright is not relevant to this activity one way or another. There is simply no evidence for the claims of the Tech Council that the lack of a TDM exception is "a barrier to many AI companies training or hosting their models in Australia". As mentioned above in 11(e) there is no guarantee that more permissive copyright laws will increase AI developer operations in Australia.

   (ii) Australia is already witnessing an explosion in AI services in both public and private use which are proliferating across every technology platform. The Interim Report at page 9 notes AI implementation in law firms and education settings in Australia, taking place without a TDM exception. We are self-evidently not missing out on any productivity gain.

The harms of a TDM

12. On page 28 of the Interim Report "to assist its consideration of this option, the PC is seeking feedback about the likely effects of a TDM exception on the AI market, the creative sector and productivity in general". The PC will already be aware of the widespread concern and dismay unanimously expressed by individuals and institutions in the creative sector in response to the TDM exception proposal in the Interim Report. In addition:

   (a) **Loss of creative revenue:** We refer the PC to the information in the 12 November 2024 submission by Creative Australia, the Australian Government's principal arts investment and advisory body, to the Treasury's Review of AI and the Australian Consumer Law[15]. That submission provides a detailed analysis of the presently occurring and potential harms of unregulated generative AI on Australia's creative sector. To extract one quote of many, on page 13 in relation to productivity: "There is potential for negative impacts of generative AI on Australia's broader GDP. In addition to loss of income, concentrated ownership of AI applications is further compounding the potential impact on revenue models and has led to a significant transfer of revenue away from local creative sectors."

   (b) **A TDM exception would entrench imbalances of power and market dominance:** Screenrights submits that a TDM exception would entrench imbalances of power and market dominance both as between technology and creators; and as between large and small creators. In other words, a TDM exception will disproportionately reduce rights and remuneration for small and individual creators in Australia:

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[12] Health expenditure - Australian Institute of Health and Welfare
[13] Scott Farquhar, National Press Club Address – July 2025 - Tech Council of Australia ; Google calls for relaxing of Australia's copyright laws so AI can mine websites for information | Artificial intelligence (AI) | The Guardian
[14] Amazon data centre investment in Australia
[15] Review of AI and the Australian Consumer Law

(i) The ACCC in its March 2025 *Digital Platform Services Inquiry final report*[16] confirmed what is obvious to most Australians, that "big tech" like Google, Meta, Apple, Microsoft and Amazon hold concentrated and almost insurmountable market power through dedicated digital ecosystems. The ACCC recommends, among other things, "the need for regulatory reform to address digital platform-related competition and consumer harms, and an economy-wide prohibition on unfair trading practices". Why would Australia hand digital platforms further power against creators who are already at an extreme disadvantage by enacting a TDM exception to copyright?

(ii) The behaviour of Meta and Google during the introduction of Australia's News Media Bargaining Code in 2021 and 2022 is an indication of what Australia is up against if we implemented a TDM exception and then tried to enforce fairness against AI developers[17]. When the Commonwealth announced proposed legislation to require Meta and Google to pay for Australian news republished by them, Meta reacted by blocking Australian news entirely across Facebook and Instagram for several days (including emergency services pages) and Google threatened to discontinue service to Australian IP addresses. While Google eventually entered into licensing deals with most Australian news publishers big and small, it discontinued its licensing agreements with 24 small news publishers in 2025[18]. Meta on the other hand flatly refused to even meet with small publishers and even refused to negotiate with well-established news publishers like SBS and the Conversation[19]. Meta also ended its licensing deals with larger news publishers in 2024[20]. We submit that this same imbalance would play out with a TDM exception. To the extent that a TDM exception does not preclude copyright licensing, that would only be the case for large and powerful rightsholders. Smaller rightsholders (who already struggle) will become even more disadvantaged.

(iii) Screenrights is aware that not all AI developers are the same. Screenrights is aware that some AI developers are motivated to behave in a fair, transparent, ethical manner with appropriate respect for copyright law and a recognition of the wonderful skill, dedication and creative brilliance embodied in creative material. But many of the largest and most powerful AI developers are arguably not motivated by these things and are deeply resistant to any form of regulation. We should not give any more scope to AI developers to extract revenue at the expense of creators. The prospect of resistance does not mean Australia should shy away from compelling AI developers to comply with its copyright regime.

Enhanced copyright licensing is the way forward

13. Research conducted by the Australian Bureau of Communications, Arts and Regional Research found that cultural and creative activity contributed $63.7 billion to Australia's economy in 2022–23[21]. Creative industries also have very strong First Nations representation. Enhanced abilities to license content for AI purposes could bring significant contributions to Australia's economy and further strengthen Australia's cultural identity.

14. The possibility of a TDM exception is itself an obstacle. Screenrights submits that even a consideration of a TDM exception acts as a disincentive for licensing in Australia. Technology companies will not enter into licences when they believe that they could convince the Commonwealth to give them a free exception instead. Therefore, the Commonwealth should state clearly and

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[16] Digital Platform Services Inquiry final report - March 2025 | ACCC

[17] Page 9 of the November 2022 Treasury Report *News Media and Digital Platforms Mandatory Bargaining Code The Code's first year of operation* News Media and Digital Platforms Mandatory Bargaining Code; Changes to Sharing and Viewing News on Facebook in Australia;
https://www.abc.net.au/news/2021-02-18/facebook-credibility-brought-into-question-health-emergency-news/13166318

[18] Google ditches million-dollar deals with publishers amid Labor inaction

[19] Australia's news media bargaining code pries $140 million from Google and Facebook - Poynter; Rod Sims says Facebook should be forced to negotiate with SBS under news media bargaining code

[20] Meta is ending its deals to pay for Australian news content. This is how it could change your Facebook and Instagram feeds

[21] Highlighting the value of our cultural and creative activity | Office for the Arts

unequivocally that there will be no TDM exception in Australia; and that it considers TDM for AI training to be an infringement of copyright unless licensed.

15. Clearly, the technology sector is aware they are on uncertain ground in relation to training generative AI models and copyright infringement. This is evidenced by the increasing number of licences being sought overseas. For example in the US AI developer Runway which has obtained a film and TV licence from entertainment studio Lionsgate who are makers of titles such as *The Hunger Games* and *John Wick*[22].

16. The Interim Report on page 25 refers to facilitating licensing through collecting societies. Collecting societies, such as Screenrights, have experience in bundling content and licensing that content where individual transactions are not economically viable; or in other words where the transaction cost of an individual licence is greater than the value of the licence. For example, Screenrights administers collective statutory licences in Australia for educational use, government use and retransmission of television and radio, and a voluntary licence for educational use in New Zealand.

17. We consider that universal compulsory licensing (i.e. where copyright owners are obliged to participate in a licensing scheme) is not appropriate for training AI models. This is both because of the nature of AI training, and its value. Its nature means that some copyright owners may not wish to license their content (e.g. for moral rights concerns); and its value means that other copyright owners with large repertoires of content may be able to license individually in an economically efficient way. However, enhancing licensing frameworks, particularly collective licensing frameworks, will reduce barriers to transactions between the technology and creative sectors and assist smaller copyright owners in asserting their rights.

18. Screenrights submits that the Government focus should be on expanding and clarifying how collective licensing could apply to AI training. There are different forms of collective licensing regimes that have been developed around the world, and some may be more appropriate than others in their application to AI. This is a complex field and the commercial and technical factors are variable. Screenrights submits that the Government should look carefully at potential collective licensing models, to see which, if any, may be appropriate in these circumstances and what should be done to facilitate this. Screenrights submits that the correct forum for this consideration is the Attorney-General's Copyright Artificial Intelligence Reference Group (CAIRG) which has representation from all the relevant stakeholders and experience in the legal, commercial and technical complexities.

Impose transparency obligations on AI models:

19. On page 20 of the Interim Report, the PC makes Draft Recommendation 1.2: "AI specific regulation should be a last resort" Screenrights disagrees. It is essential that Australia mandates transparency from AI models that operate here. AI scraping is unprecedented and existing regulatory frameworks are not equipped to impose this very necessary obligation.

20. A lack of transparency is a barrier to effective licensing and therefore a barrier to realising financial benefits from AI for creators operating in Australia. Technology companies should be required to disclose the works that they have used in Australia in their activities, to allow the copyright owners to enforce their rights and license the works. We note the issue of transparency for AI was addressed in detail by CAIRG following the 17 September 2024 discussion paper on the topic. The outcome of those discussions was consolidated in a publication on 4 February 2025 which showed there was broad support for mandating transparency of inputs for AI models[23].

21. *The exception would be where the works are owned by the AI company or licensed to the AI company. In those circumstances, Screenrights considers that transparency is not necessary.*

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[22] Lionsgate announce collaboration with AI video company Runway
[23] Copyright and AI – Transparency discussion paper | Attorney-General's Department

22. Screenrights does not agree that transparency should be achieved by copyright owners commencing litigation and seeking the information through court mandated discovery processes. Such an approach would create burdens on the court system, disadvantage smaller copyright owners who can ill afford litigation thus entrenching the power imbalances, and be inconsistent with Australia's policy approach of facilitating bargaining to avoid unnecessary litigation.

23. On page 25 of the Interim Report the PC posits that "Australian copyright regime is not keeping pace with the rise of AI technology – whether because it does not adequately facilitate the use of copyrighted works or because AI developers can too easily sidestep existing licensing and enforcement mechanisms". We strongly assert that it is the latter, and that this could be countered with transparency obligations. Generative AI models are commercial enterprises and should be treated as such. AI models easily have the capability to record and report on content used for training purposes. "Too difficult" is not a reasonable argument when we are discussing technology with apparently limitless capabilities to manage data and generate information summaries.

Information request 1.1

24. Screenrights provides direct responses to the questions raised on page 28 of the Interim Report below.

25. PC Question: *Are reforms to the copyright regime (including licensing arrangements) required? If so, what are they and why?* Screenrights' answer: **Transparency obligations are required, although we would not expect these to be implemented through the copyright framework. In terms of copyright, there should be support to facilitate and, if necessary extend, the existing collective licensing schemes to enable willing creators to participate in text and data mining licences. The response to "why" has been addressed at length previously in this submission.**

26. PC question on TDM: *How would an exception covering text and data mining affect the development and use of AI in Australia? What are the costs, benefits and risks of a text and data mining exception likely to be?* Screenrights' answer: **We strongly reject the idea that it would confer any real benefit to Australians outside of a handful of multinational technology companies who have the resources to license the copyright but prefer not to, and instead it would further weaken the position of Australian copyright holders and potentially rob creators of their livelihoods.**

27. PC question on TDM: *How should the exception be implemented in the Copyright Act – for example, should it be through a broad text and data mining exception or one that covers non commercial uses only?* Screenrights' answer: **Australia should not implement a text and data mining exception.**

28. PC question on TDM: *Is there a need for legislative criteria or regulatory guidance to help provide clarity about what types of uses are fair?* Screenrights' answer: **Australia should clarify that text and data mining without a licence is infringement of copyright. This will enable certainty and encourage appropriate licensing.**

Conclusion

Screenrights' position is simple and representative of a consensus in the creative sector: creators' rights must be protected and should not be allowed to be undermined by a TDM exception. AI developers should pay their way. Australia should not introduce a TDM exception to copyright. Australian copyright owners should not be asked to subsidise giant, multinational companies who are able to purchase licences here, as they do in other countries including in the US. Australian copyright owners are ready and willing to offer licences on fair terms. Australia should look to facilitate that licensing rather than remove creators' existing rights to fair payment. Australia should introduce transparency obligations on AI models to enable accurate copyright licensing.

Screenrights welcomes feedback on its proposals and looks forward to discussing them further with the PC, stakeholders and subject matter experts, with a view to working together to implement solutions, both for the short term to the long term, in relation to the issues raised in this paper.