

RIAA Submission:

Getting it right: Building AI infrastructure that works for Australia

9 October 2026

Overview

The Responsible Investment Association Australasia (RIAA) thanks the Australian Government for the opportunity to comment on the future of artificial intelligence (AI) training and large data centres (the [consultation](#)). RIAA agrees that a nationally consistent approach to legislation and standards is necessary to provide the certainty required for investment attraction and to minimise investment risk. RIAA welcomes the Prime Minister's [announcement](#) of national AI laws in Australia's interests.

AI and its supporting infrastructure can create material financial, environmental, social and system-level risks for institutional investors and their beneficiaries. Clear governance, credible safeguards and decision-useful disclosure are therefore important to enable investors to assess these risks and support durable, responsible innovation.

RIAA recommends that the Australian Government:

- establish nationally consistent, enforceable requirements for large data centres and frontier AI development, with obligations proportionate to material risks and impacts;
- ensure new data centre demand is supported by additional renewable energy, appropriate storage and flexibility, while avoiding the transfer of attributable costs to households and other businesses;
- require transparent and comparable reporting on material energy, water, emissions, environmental and community impacts;
- require early and meaningful engagement with affected communities and rights holders, including the protection of First Nations Peoples' rights, Country and cultural heritage; and
- establish risk-based, human-rights-centred safeguards across the AI lifecycle, with clear accountability, due diligence, testing and assurance, monitoring, transparency and access to remedy.

A just and equitable transition should underpin these measures. Managing impacts on workers, communities, consumers, First Nations Peoples and the environment will be important to maintaining social licence and ensuring that the benefits of AI are durable and broadly shared.

RIAA has responded to selected consultation questions where it can contribute an investor and responsible investment perspective. For further information, please contact RIAA Policy at policy@responsibleinvestment.org.

About RIAA

The Responsible Investment Association Australasia champions responsible investing and a sustainable financial system in Australia and Aotearoa New Zealand. It is dedicated to ensuring capital is aligned with achieving a healthy society, environment and economy.

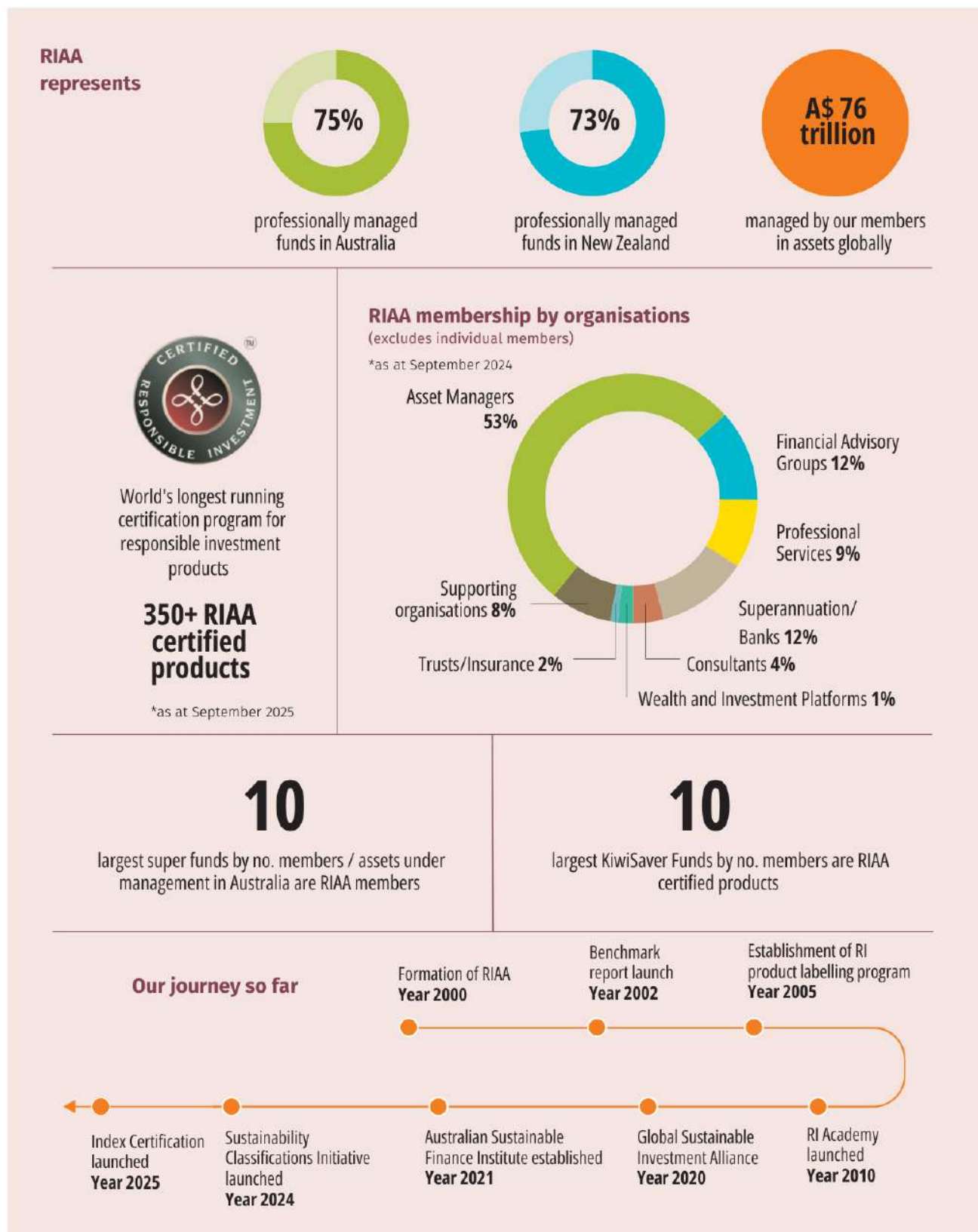


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- How can communities and industry work together to ensure data centres deliver lasting community benefits? How can upfront commitments be reflected in state and territory planning processes or community engagement?
- How should data centre operators be required to provide skills and training opportunities, including for under-represented cohorts in skilled workforces, during construction and into ongoing operation?

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- What international approaches, including regulatory and non-regulatory frameworks, should inform the safety, transparency or security conditions Australia applies to developers of frontier AI models?
- How should safety and security conditions for AI training be designed to keep pace with rapid technological change, while providing sufficient legal certainty for investors and operators?
- What information should AI developers be required to share with the Australian Government and how?
- What safeguards should apply?
- What contributions would add the greatest value to Australia's future industries and research and innovation system?
- How should frontier AI developers measurably support skills, training and education opportunities beyond what is required of data centre operators to create a sustainable workforce and contribute to required workforce adaptations?

General comments

Risks of AI to institutional investors

The deployment of artificial intelligence creates material risks for investors because inadequate design, governance or use can affect company value, portfolio resilience and the stability of the wider economy. RIAA's [Artificial Intelligence and Human Rights Investor Toolkit](#), released in May 2024, highlights that AI-related harm is not only an ethical concern. It can translate into legal liability, regulatory intervention, operational disruption, remediation costs, loss of customer trust and damage to social licence. These risks can arise across the AI value chain—including developers, providers of data and infrastructure, companies deploying AI, and businesses whose products or services are reshaped by it—so exposure may be broader and less visible than investors expect.

At a company level, investors need to consider whether AI is being deployed with effective Board oversight, human rights due diligence, testing, transparency and accessible remedy. Poorly governed systems can produce biased or discriminatory outcomes, invade privacy, enable surveillance, amplify misinformation, undermine worker rights, misuse intellectual property or make consequential decisions that affected people cannot understand or contest. Cybersecurity failures, unsafe outputs, unreliable models and AI “hallucinations” can also compromise services and decision-making. Where companies move quickly without adequate capability, controls or human oversight, expected productivity gains may be offset by implementation failure, litigation, regulatory penalties, reputational damage and stranded technology investment.

AI also creates significant environmental, social and system-level risks that may affect diversified portfolios. Training and operating advanced models can drive substantial demand for electricity, water, land, minerals and data centre infrastructure, increasing exposure to emissions, resource constraints, community opposition, impacts on nature and Country, impacts on cultural heritage and higher costs for users. Rapid automation may disrupt employment and wages, deepen inequality and weaken the consumer demand on which many business models depend. At the same time, AI-generated content and misinformation can erode trust in institutions and markets. Concentration of compute, data and model ownership can entrench market power and create dependencies on a small number of providers, while interconnected use of similar models may produce correlated errors and new sources of systemic risk.

Developments such as growing inequality, increased unemployment and undermining of market confidence create additional and compounding uncertainties and risks for investors, particularly universal owners. Given the rapid uptake and deployment of AI across our society, these risks cannot be divested away.

For investors, the central issue is therefore whether investee companies can demonstrate responsible deployment across the full AI lifecycle. Decision-useful disclosure should explain accountability, material use cases, affected stakeholders, testing and assurance, data and cybersecurity controls, serious incidents, environmental impacts and remediation. Investors can use stewardship, voting, engagement and capital allocation to press for safeguards proportionate to the severity, scale, likelihood and remediability of harm. Without clear governance and credible evidence that controls work in practice, investors may be unable to price AI-related risks accurately or distinguish durable innovation from short-term claims, leaving beneficiaries exposed to avoidable financial and systemic harm.

Strong, enforced baseline laws regulating the expansion, deployment and use of AI will go some way to mitigating the significant reputational, operational, regulatory, financial and social risks facing investors investing in the AI value chain. This current consultation should translate high-level government principles into legislated national standards.

Risks of losing social licence

AI development and deployment depend on public confidence that benefits will be widely shared and that harms will be prevented, addressed and remedied. Social licence may be lost where communities, workers and consumers experience AI as something done *to* them rather than developed *with* them. This risk is pronounced where deployment is opaque, accountability is unclear or people cannot challenge consequential decisions. The [Australian Government's own approach](#) to responsible use of AI recognises transparency, governance, risk assurance and public trust as mutually reinforcing requirements.

For investors, loss of trust can become a material investment risk. Lack of trust can drive community opposition, workforce resistance, customer disengagement, regulatory intervention, project delay and higher compliance or remediation costs. It may also constrain adoption and weaken the durability of anticipated productivity gains. The risk is heightened where AI-related infrastructure imposes local costs (such as pressure on energy, water, land, nature or cultural heritage) without credible participation, benefit-sharing or safeguards.

Examples: The impact of losing social licence

- **Australia:** A Perth proposal was abandoned after nearly 1,900 public objections and a recommendation for refusal.
- **United States:** A US\$1.5 billion proposal in San Marcos, Texas, was halted following strong opposition concerning water scarcity, grid impacts and environmental sustainability.
- **Ireland:** Electricity-system pressures prompted restrictions on new data centre connections; one delayed Dublin project reportedly exposed its developer to a €152 million compensation claim.
- **Europe:** Over 70 projects were reportedly rejected or restricted in early 2026, while opposition affected about US\$42 billion of investment through delays and cancellations.

A just and equitable transition should therefore be treated as a core condition of responsible AI adoption, not as a response after disruption occurs. The [OECD AI Principles](#) call for inclusive growth, sustainable development and wellbeing, human rights, transparency, safety and accountability, and recommend building human capacity and preparing for labour-market transition. The [International Labour Organization](#) similarly emphasises proactive policy, job quality, fair transitions, social dialogue and effective regulation; its research also indicates that impacts may be unevenly distributed, including greater exposure among women because of occupational patterns.

Government and companies should assess distributional impacts before deployment; engage affected workers, unions, communities, First Nations Peoples and other rights holders early and meaningfully; provide accessible information and genuine influence over material decisions; invest in skills, reskilling and pathways to good work; protect job quality, privacy, equality and human oversight; and establish effective grievance, contestability and remedy mechanisms. The [Australian Human Rights Commission](#) has likewise called for AI innovation to be consultative, inclusive and accountable, supported by robust human rights safeguards.

For investors, credible transition planning includes Board accountability, human rights due diligence, workforce and community impact assessment, measurable commitments, disclosure of outcomes and evidence that affected groups have participated in decision-making. The [UN Guiding Principles on Business and Human Rights](#) provide an appropriate baseline through the duties to protect, respect and remedy. These measures can help preserve social licence, reduce implementation and regulatory risk, and ensure that AI-derived value is created in a way that is durable, legitimate and fairly shared.

Response to consultation questions

Requirements for large data centres

Make a positive contribution to Australia's energy transition

- **How could obligations be phased in to account for the time needed to build data centres and new renewable projects?**

RIAA recommends predictable, staged implementation that provides investment certainty but does not allow data centre load to become operational without a credible pathway to additional clean generation. New facilities should be matched with additional renewable energy generation arranged before operation.

Phasing should be tied to transparent project milestones. Proponents should publish a plan showing expected demand, contracted or financed additional generation, storage and flexibility, interim emissions implications and the date of full compliance. Transitional arrangements should be time-limited and should not reward delay.

The framework should provide clear long-term demand signals capable of supporting investment in generation, storage and networks, while protecting consumers from costs attributable to new data centre demand.

- **How should “new” renewable capacity be defined in relation to data centre investments?**

RIAA recommends that “new” reflect demonstrable additionality: generation that is built, expanded or materially brought forward because of the data centre’s investment or long-term demand commitment.

Existing generation or certificates detached from new supply should not satisfy an additionality obligation. The framework should require transparent evidence of the causal contribution, expected generation, commencement date and treatment of shortfalls, while avoiding unnecessary prescription that could impede legitimate contracting structures.

The investor outcome should be credible expansion of clean supply, reduced transition and greenwashing risk, and confidence that new loads are not simply reallocating existing renewable electricity away from other users.

- **What incentives or obligations would encourage investment in on-site generation, batteries or flexible demand measures?**

RIAA recommends a framework that rewards measurable contributions to clean energy and system efficiency and requires larger facilities to manage the costs and risks created by their load.

Relevant outcomes include additional renewable generation, storage and firming, demand response and controllable load, reduced peak demand, participation in system-support arrangements and transparent reporting of performance.

Policy should allow operators flexibility in how they achieve these outcomes, while ensuring additional energy is renewable and that costs attributable to data centre demand are not shifted to households or other businesses. Stable rules and clear long-term signals will support investment while reducing stranded asset and regulatory risks.

- **What unintended consequences or implementation challenges should government consider?**

The framework should facilitate additional clean supply, credible transition alignment, transparent reporting, grid stability, community protection and predictable investment conditions.

RIAA recommends testing the framework against the following risks:

- certificate-only compliance that does not add clean generation;
- cost shifting to households and other businesses;
- increased fossil fuel generation or emissions leakage during supply shortfalls;
- discouraging storage, flexibility or more efficient computing;
- inconsistent state and Commonwealth requirements;
- short-term rule changes that undermine investment certainty;
- opaque claims that create greenwashing risk;
- negative impacts on nature, water, Country and cultural heritage; and
- renewable projects proceeding without appropriate community participation or benefit sharing.

- **What performance metrics or ratings would reflect an appropriate standard for energy usage and efficiency in data centres?**

RIAA recommends comparable, facility-level and decision-useful metrics to ensure the deployment of data centres align with Australia's net zero targets.

Metrics should cover:

- total annual electricity consumption;
- peak and maximum demand;

- an established operational efficiency measure such as PUE or an appropriate NABERS rating, with any mandatory threshold developed through expert technical consultation;
- carbon emissions, supported by a clear methodology. Given the emissions generation of data centres, these should be required to report emissions data regardless of whether they are in scope for mandatory climate reporting;
- renewable-electricity sourcing and demonstrated additionality;
- on-site generation, storage and demand-flexibility capability; and
- progress against publicly stated transition plans.

Should the Commonwealth establish national baseline energy and water efficiency metrics for data centres?

Yes. RIAA recommends nationally consistent baseline metrics. Fragmented or non-comparable reporting would limit investors' ability to assess operational efficiency, transition alignment and exposure to regulatory, climate and resource risks.

The baseline should use clear definitions, support facility-level comparison, distinguish absolute consumption from efficiency, be proportionate to facility size and impact, align with climate-related reporting where practicable, accommodate future improvements and make data gaps visible.

National consistency would reduce duplication for operators and provide investors, governments and communities with a credible evidence base.

Should all data centres be required to meet energy and water performance thresholds? If not, how should requirements change or scale?

RIAA recommends a common minimum standard for all material facilities, with stronger requirements which are scaled according to electricity demand, water use, location, cumulative regional impacts and potential consequences for communities and infrastructure. Requirements should be outcomes-focused.

How frequently should data centres transparently and publicly report energy use, efficiency and emissions?

RIAA recommends at least annual public reporting, supported by more frequent regulatory reporting where needed for energy-system planning, compliance or management of material impacts.

Public reporting should be facility-level, consistent across periods, sufficiently timely to identify deteriorating performance, accompanied by methodology and boundary information, aligned with climate-related disclosures where practicable and subject to proportionate assurance.

Material breaches, significant incidents or major changes in projected energy demand should be required to be reported promptly. A public national database would improve comparison, accountability and investor decision-usefulness.

Use innovative, efficient and sustainable solutions to minimise water use

- **Should data centres be required to meet performance metrics or ratings for water usage and efficiency?**

Yes. RIAA recommends performance metrics that capture both efficiency and absolute impact. A low water-use ratio may still conceal material pressure where a large facility operates in a water-stressed catchment.

Metrics should cover total withdrawal and consumption, water source, peak demand, efficiency, cooling method, discharge, drought resilience and local catchment conditions. They should also identify material dependencies and impacts on ecosystems, communities and existing users.

Given their significant water usage that risks resulting in negative impacts on nature and local communities, data centres should be required to report in accordance with the [Taskforce on Nature-related Financial Disclosures](#) (TNFD) framework.

- **What aspects of water use should data centres transparently and publicly report?**

RIAAs recommends facility-level disclosure of:

- annual withdrawal and consumption;
- maximum and peak demand;
- potable, recycled, non-potable, groundwater and surface-water sources;
- catchment and local water-stress context;
- cooling technology and efficiency measures;
- discharge volumes and quality where material;
- drought-resilience plans;
- impacts on environmental water requirements and other users;
- targets, performance and material incidents; and
- engagement with affected communities and First Nations Peoples where relevant.

- **Should a nationally consistent hierarchy of water sources be adopted?**

Yes, potentially as a principles-based hierarchy. RIAA recommends that operators first minimise total water demand, then maximise reuse and closed-loop systems, and prioritise fit-for-purpose recycled or non-potable sources over potable water where environmentally and operationally appropriate.

The hierarchy should not treat all non-potable sources as inherently sustainable. Decisions should account for catchment conditions, ecosystem dependencies, energy and emissions implications, water quality, cumulative impacts and the rights and needs of existing users.

- **Where recycled or non-potable supplies are unavailable, what alternative approaches might achieve equivalent water-security outcomes?**

RIAA recommends requiring a time-bound, location-specific water-security plan, rather than allowing unrestricted potable-water use or reliance on generic offsets. For example, TNFD’s location-, dependency-, impact- and response-based approach supports catchment-specific framing.

The plan should demonstrate demand minimisation and best available efficiency; consideration of alternative cooling; investment in local recycled-water or efficiency infrastructure where feasible; measurable catchment-level issues; protection of environmental water requirements and existing users; transparent milestones and independent verification; and a transition pathway if an interim arrangement is approved.

Any offset or compensatory measure should deliver additional, durable and geographically relevant benefits and should not substitute for avoiding and minimising impacts at the facility.

- **Should data centres demonstrate that proposed water use will not adversely affect local water security, drought resilience, environmental water requirements or existing users?**

Yes. This should form part of planning and ongoing compliance for material facilities. Assessment should be independent, location-specific and consider cumulative impacts, climate scenarios, seasonal and peak demand, ecosystem requirements and existing community and economic uses. Compliance should be monitored as catchment conditions change.

Where water use may affect Country, cultural heritage or First Nations Peoples’ rights and interests, proponents should undertake early and meaningful engagement and respect Free, Prior and Informed Consent (FPIC) in circumstances where it is applicable. RIAA does not suggest that every data centre project automatically triggers the same process; requirements should reflect the project’s location, impacts and affected rights.

The Dhawura Ngilan Business and Investor Initiative should be used as a framework to appropriately manage First Nations cultural heritage in accordance with the principles of Free, Prior, Informed Consent (FPIC).

Dhawura Ngilan Business and Investor Initiative (DNBII or the Initiative)

In October 2021, the DNBII was established to bring together First Nations, business and investor communities to focus on strengthening Australia's First Nations Peoples' heritage laws and standards for the private sector to uphold the human rights of First Nations Peoples. Led by the First Nations Heritage Protection Alliance in partnership with the Global Compact Network Australia (GCNA) and RIAA, this Initiative sees protecting cultural heritage as the responsibility of all Australians, including the finance and business sectors.

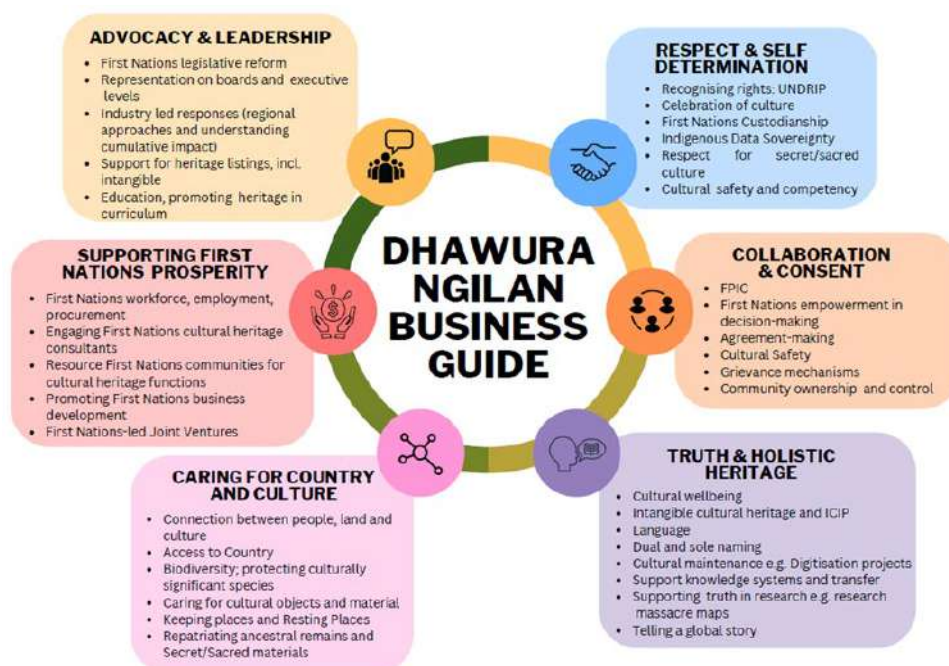
The Initiative launched two documents in March 2024 by then-Minister Tanya Plibersek:

- Principles for Businesses and Investors; and
- Business and Investor Guide.

These guides provide:

- a set of twenty standards which collectively illustrate the expectations of First Nations Peoples for how the private sector will interact with First Nations cultural heritage;
- how to operationalise the Dhawura Ngilan Principles;
- six sections outlining a series of Key Actions associated with each Dhawura Ngilan Principle for different types of businesses; and
- tailored guidance to assist investors to integrate cultural heritage considerations into decision-making, including during due diligence, assessing disclosures, corporate engagement, and stewardship.

The Dhawura Ngilan principles for the private sector are as follows:



Impose no net costs on consumers and communities

- **What requirements should be placed on data centres to operate flexibly to support the operation of the electricity grid and improve system efficiency while protecting consumers from increased energy costs?**

Flexibility requirements should include safeguards for essential services, safety and security and provide sufficient certainty for long-term investment. These requirements should support long-term policies and coordinated investment in renewable generation, storage and enabling infrastructure. Storage, demand response and controllable data centre loads may help reduce system impacts.

Given the risk that AI data centres will shift costs to others, large data centre users should be required to bear an appropriate share of attributable network and generation costs and provide transparent evidence of relevant safeguards.

RIAA recommends that large data centres be required to demonstrate how they will manage their electricity demand in ways that support, rather than undermine, an affordable and reliable energy transition.

Requirements should be outcomes-focused and proportionate to the scale and system impact of the facility. They should encourage or require large data centres to:

- use demand-response and controllable-load capabilities where technically feasible;
- invest in or contract sufficient renewable generation, storage and firming to manage their contribution to peak demand;
- participate in arrangements that reduce demand during periods of system stress or scarcity;
- transparently report peak demand, flexibility capability and performance; and
- bear an appropriate share of costs directly attributable to their demand rather than transferring these costs to households and other electricity users.

- **Aside from infrastructure and network augmentation costs attributable to their energy and water demand, are there other significant potential costs from data centre activity, and how might accountability be provided for managing these?**

Yes. RIAA recommends that the framework recognise the full range of material environmental, social and economic impacts associated with large data centres rather than considering energy and water infrastructure costs in isolation.

RIAA recommends applying the mitigation hierarchy: avoid and minimise impacts before relying on offsets or compensation. Accountability should include Board and senior management responsibility, pre-approval impact and risk assessment, measurable commitments, ongoing monitoring, public reporting and accessible grievance and remedy mechanisms.

Potential costs include:

- increased emissions where additional electricity demand is not matched by additional clean generation;
- impacts on water availability, catchment resilience, ecosystems and biodiversity;

- competition for energy, water, land and infrastructure affecting communities and existing users;
- impacts on First Nations Peoples’ rights, Country and cultural heritage;
- workforce and human rights impacts across data centre and AI value chains; and
- cumulative and system-level impacts where facilities are concentrated in the same region.

Engage meaningfully with local communities and councils

- **What does best-practice community engagement look like for data centres, including with nearby businesses?**

RIAA recommends that community engagement be early, meaningful, inclusive and ongoing, beginning before key project decisions have effectively been made and continuing throughout construction and operation. This will help to minimise investment risks, including to social licence and cultural heritage.

Where developments may affect First Nations Peoples’ rights and interests, Country or cultural heritage, proponents should engage early and in culturally appropriate ways. Effective engagement also reduces legal, regulatory, reputational and operational risks and supports durable investment outcomes.

Engagement should:

- identify communities and rights holders that may be affected;
- provide accessible information about expected energy and water use, infrastructure requirements, environmental impacts and community benefits;
- enable communities to influence material project decisions rather than simply be informed of them – the Dhawura Ngilan Business and Investor Initiative guide should be used (see [above](#));
- transparently explain how community concerns have affected project design;
- establish accessible grievance and remedy mechanisms; and
- report publicly against material commitments made during consultation.

- **How can communities and industry work together to ensure data centres deliver lasting community benefits? How can upfront commitments be reflected in state and territory planning processes or community engagement?**

RIAA recommends that significant data centre developments establish transparent, measurable and enforceable community benefit commitments developed through meaningful engagement with affected communities.

Benefits should respond to local priorities rather than being determined solely by proponents. Depending on location and project, these could include investment in local infrastructure, skills and employment, renewable energy and storage, water infrastructure, telecommunications connectivity or other locally identified priorities.

Government should consider mechanisms that:

- document material community commitments during planning and approval;
- establish measurable outcomes and implementation timeframes;
- require ongoing reporting against commitments;
- provide accountability where commitments are not delivered; and
- ensure benefits are durable rather than limited to construction.

Where First Nations Peoples are affected, benefit-sharing should be developed directly with relevant Traditional Owners and should not substitute for rights, cultural heritage protections or FPIC where applicable. RIAA supports shared value, accountability and social licence, including scrutiny of whether project costs and benefits are distributed fairly.

Contribute to building skills and training opportunities

- **How should data centre operators be required to provide skills and training opportunities, including for under-represented cohorts in skilled workforces, during construction and into ongoing operation?**

RIAAs recommends that workforce development form part of the responsible planning and operation of large data centres, with requirements proportionate to the scale of investment and workforce demand.

Requirements should focus on measurable outcomes while allowing flexibility for local labour-market conditions. RIAA considers workforce impacts part of a responsible, just and equitable transition. Where projects affect First Nations communities, workforce and training opportunities should be developed through meaningful engagement and reflect community priorities. RIAA does not recommend detailed employment quotas through this consultation.

Operators should develop workforce plans covering construction and ongoing operations, including:

- anticipated workforce and skills requirements;
- partnerships with vocational education, universities and other training providers;
- apprenticeships, traineeships and pathways into skilled employment;
- measures to broaden access to employment and training opportunities;
- reskilling and professional development as technology and job requirements change; and
- transparent reporting on outcomes.

Conditions for AI training

Australia's security and safety will benefit from AI training

- **What international approaches, including regulatory and non-regulatory frameworks, should inform the safety, transparency or security conditions Australia applies to developers of frontier AI models?**

RIAA recommends that the Australian Government adopt a risk-based, human-rights-centred and lifecycle approach to frontier AI regulation. Current AI governance gaps should be addressed through regulation. Obligations should be proportionate to the severity, scale, likelihood of and ability to remediate potential harm, rather than relying only on model size or technical capability. There must be limits on uses considered too harmful to proceed.

The framework should incorporate:

- clear Board and senior management accountability;
- human rights due diligence covering actual and potential impacts;
- pre-deployment testing and independent assurance for higher-risk systems;
- ongoing monitoring, incident escalation and accessible remedy;
- transparency sufficient for government, investors and affected stakeholders to assess whether safeguards are effective; and
- meaningful human oversight and contestability where AI affects people or communities.

International frameworks should promote interoperability while preserving Australia's ability to address local risks.

The Australian eSafety Commissioner's [Safety by Design](#) approach provides an established Australian model for embedding safety throughout the product lifecycle.

The [European Union's AI Act's](#) transparency, documentation, model-evaluation, systemic-risk, incident-reporting and cybersecurity requirements and the US state of California's [Transparency in Frontier Artificial Intelligence Act](#) provide interesting legal frameworks that govern AI.

- **How should safety and security conditions for AI training be designed to keep pace with rapid technological change, while providing sufficient legal certainty for investors and operators?**

RIAA recommends legislation that establishes durable outcomes-based duties, supported by standards and guidance that can be updated as technology and evidence evolve.

Primary legislation should clearly define accountability, due diligence, testing, monitoring, incident-reporting, transparency and remedy obligations. More adaptable instruments can then specify technical methods and assurance expectations. Changes should be developed transparently, with consultation (including with investors), reasonable transition arrangements and guidance.

For investors, legal certainty does not always require rules to remain static. It requires clarity about which entities and activities are covered, who is accountable, the evidence required to demonstrate compliance, how material incidents must be addressed and how requirements will be reviewed and updated.

It is important that investors are able to access information to assess risk, governance and long-term value.

• **What information should AI developers be required to share with the Australian Government and how?**

Public disclosure should provide investment decision-useful information about material risks, governance, safeguards, incidents and remediation without requiring publication of personal information, security-sensitive material or legitimate trade secrets.

Developers of frontier AI should provide government with information on:

- governance and accountable decision-makers;
- material capabilities and limitations;
- human rights and safety risk assessments;
- testing, assurance and safeguard effectiveness;
- serious incidents, near misses and remediation;
- cybersecurity and data governance controls;
- complaints, contestability and remedy processes; and
- material energy, nature, water and carbon emissions impacts.

• **What safeguards should apply?**

RIAAs recommends safeguards across the full AI lifecycle, including:

- Board oversight and senior management accountability;
- human rights due diligence before development or deployment, and throughout use;
- flagging and discontinuation for major environmental and social risks;
- testing and independent assurance proportionate to risk;
- privacy, data security and cybersecurity controls;
- meaningful human oversight for consequential decisions;
- continuous monitoring and mandatory escalation of material incidents;
- accessible complaints, contestability and remedy;
- protection for whistleblowers and internal escalation; and
- public reporting on safeguard effectiveness.

Invest in local capability, skills, research and innovation

- **What contributions would add the greatest value to Australia’s future industries and research and innovation system?**

RIAA recommends that government assess contributions according to the long-term economic, social and environmental value they create for Australians, rather than the scale of capital investment or compute capacity installed.

High-value contributions could include:

- applications of AI to public-interest challenges, including addressing climate change, nature loss and other sustainability challenges;
- access to compute for Australian researchers and public-interest applications;
- locally based research, engineering and technical capability;
- investment in skills, vocational education and workforce development;
- support for responsible AI, safety and human rights research; and
- commercialisation pathways for Australian research and innovation.

- **How should frontier AI developers measurably support skills, training and education opportunities beyond what is required of data centre operators to create a sustainable workforce and contribute to required workforce adaptations?**

RIAA recommends that frontier AI developers have responsibilities extending beyond the physical data centre workforce because the economic and workforce impacts of frontier AI extend across the broader economy.

Developers should be encouraged or required, proportionate to scale and impact, to contribute to:

- AI literacy and responsible AI capability;
- specialist technical, safety and assurance skills;
- equitable access to AI;
- partnerships with universities, vocational education and public research institutions where appropriate;
- workforce reskilling in sectors materially affected by AI adoption;
- education on human rights, governance and responsible deployment; and
- pathways that broaden participation in emerging AI-related occupations.

Contributions should be measurable and additional. Workforce adaptation should sit within broader human rights and just transition frameworks, including assessment of foreseeable impacts and engagement with affected workers and stakeholders.