**Supporting responsible AI: discussion paper**

**CALL TO ACTION FOR ALL MEMBERS:**

Opportunity to provide a collective response to the Department of Industry, Science and Resources discussion paper on AI.

It is the topic of the moment and an area that we as IM practitioners should have say.

The paper focuses on responsible AI, [Consultation hub | Supporting responsible AI: discussion paper - Department of Industry, Science and Resources](https://consult.industry.gov.au/supporting-responsible-ai) and RIMPA would like to respond as organisation on behalf of all members.

Take the time to read the provided discussion documents and the please provide your responses to one or all the questions listed below by Friday 14th July. A joint response will be collated and submitted by the required closing date.

The questions for submission are below, please provide your responses in a word format and email to admin@rimpa.com.au

**1: Definitions**

Do you agree with the definitions in this discussion paper? If not, what definitions do you prefer and why?

**2: Potential gaps in approaches**

What potential risks from AI are not covered by Australia’s existing regulatory approaches? Do you have suggestions for possible regulatory action to mitigate these risks?

Are there any further non-regulatory initiatives the Australian Government could implement to support responsible AI practices in Australia? Please describe these and their benefits or impacts.

Do you have suggestions on coordination of AI governance across government? Please outline the goals that any coordination mechanisms could achieve and how they could influence the development and uptake of AI in Australia.

**3: Responses suitable for Australia**

Are there any governance measures being taken or considered by other countries (including any not discussed in this paper) that are relevant, adaptable and desirable for Australia?

**4: Target areas**

Should different approaches apply to public and private sector use of AI technologies? If so, how should the approaches differ?

How can the Australian Government further support responsible AI practices in its own agencies?

In what circumstances are generic solutions to the risks of AI most valuable? And in what circumstances are technology-specific solutions better? Please provide some examples.

Given the importance of transparency across the AI lifecycle, please share your thoughts on

* where and when transparency will be most critical and valuable to mitigate potential AI risks and to improve public trust and confidence in AI?
* mandating transparency requirements across the private and public sectors, including how these requirements could be implemented.

Do you have suggestions for:

* whether any high-risk AI applications or technologies should be banned completely?
* criteria or requirements to identify AI applications or technologies that should be banned, and in which contexts?

What initiatives or government action can increase public trust in AI deployment to encourage more people to use AI?

**5: Implications and infrastructure**

How would banning high-risk activities (like social scoring or facial recognition technology in certain circumstances) impact Australia’s tech sector and our trade and exports with other countries?

What changes (if any) to Australian conformity infrastructure might be required to support assurance processes to mitigate against potential AI risks?

**6: Risk-based approaches**

Do you support a risk-based approach for addressing potential AI risks? If not, is there a better approach?

What do you see as the main benefits or limitations of a risk-based approach? How can any limitations be overcome?

Is a risk-based approach better suited to some sectors, AI applications or organisations than others based on organisation size, AI maturity and resources?

What elements should be in a risk-based approach for addressing potential AI risks? Do you support the elements presented in Attachment C?

Attachment C is found on page 40 of the discussion paper.

How can an AI risk-based approach be incorporated into existing assessment frameworks (like privacy) or risk management processes to streamline and reduce potential duplication?

How might a risk-based approach apply to general purpose AI systems, such as large language models (LLMs) or multimodal foundation models (MFMs)?

Should a risk-based approach for responsible AI be a voluntary or self-regulation tool or be mandated through regulation? And should it apply to:

* public or private organisations or both?
* developers or deployers or both?