

Screen Producers Australia
Submission to the Productivity Commission
Harnessing Data and Digital Technologies – Enable AI's Productivity Potential
June 2025

Introduction

Screen Producers Australia (SPA) is the peak national industry body representing the interests of independent producers across film, television, and digital media. SPA's members range from large production companies to sole traders, producing diverse content spanning drama, documentary, entertainment, animation, and interactive media. Collectively, our members are responsible for the vast majority of Australian content produced locally and contribute significantly to national cultural expression, economic activity, and employment opportunities in both metropolitan and regional areas. SPA plays an active role in policy advocacy, professional development, industrial relations, and sector growth, ensuring the sustainability and international competitiveness of Australia's independent screen production industry.

We welcome the Productivity Commission's focus on AI's potential for productivity and submit the following brief points in response to this consultation, aligning closely with the joint submission by the Australian Film & TV Bodies¹.

Executive Summary

- SPA acknowledges the growing role and productivity benefits of AI in administrative, operational, and selected creative workflows.
- Significant barriers to broader AI adoption include legal uncertainties, costs, workforce concerns, and technical maturity.
- Crucially, any use of AI must protect human authorship, creative control, and intellectual property.
- SPA strongly supports a risk-based regulatory approach, explicitly opposes a Text and Data Mining (TDM) exception, and maintains copyright policy jurisdiction with the Attorney-General's Department.

AI's Current Use and Productivity Benefits

AI is already delivering productivity benefits in the Australian screen industry, particularly in administrative and production management workflows. Around 75% of Australian producers report using AI for scheduling, budgeting, and metadata management, freeing resources for creative activities². In post-production, AI tools

¹ Australian Film & TV Bodies (2025), *Submission in Response to the Productivity Commission Consultation on Harnessing Data and Digital Technologies*, June 2025 (submission provided directly to the Productivity Commission; copy held by Screen Producers Australia).

² Screen Producers Australia (2024), *Submission to the Senate Select Committee on Adopting Artificial Intelligence (AI)*, Parliament of Australia, Submission 141, May 2024, page 4. Available at: <https://www.aph.gov.au/DocumentStore.ashx?id=ab0199c4-f3a4-4f21-87b8-f1ec777709ad&subId=756883>.

significantly reduce labour-intensive tasks such as rotoscoping, VFX editing, and automated dubbing and subtitling³. Major international studios similarly use AI for predictive analytics in greenlighting and content planning, reflecting the growing acceptance of these productivity tools⁴.

Opportunities for Expanded AI Use

Future productivity opportunities lie in expanding AI-driven administrative automation and optimising production schedules, significantly reducing pre-production workloads and resource usage⁵. AI also holds potential in creative development as a support tool for rapid prototyping, provided clear ethical and legal guidelines protect human creativity and ownership rights⁶. SPA advocates strongly for an “empower, not replace” approach, prioritising AI’s integration as assistive rather than disruptive.

Barriers to AI Adoption

Several barriers currently hinder broader AI uptake. Paramount among these is legal uncertainty regarding copyright and IP ownership, compounded by opacity in AI training datasets⁷. Smaller producers, facing significant resource and expertise constraints, struggle to invest adequately in AI tools and safeguards, further widening industry disparities. Additionally, workforce concerns, including fears of job displacement and skill erosion, pose real resistance to wider AI integration.

Risks and Stakeholder Concerns

The industry expresses considerable concern around AI’s impact on intellectual property rights, performer control, and creative authorship. Notably, creative unions have identified risks associated with unauthorised AI training on copyrighted material, demanding transparency, consent, and fair remuneration frameworks⁸. Similarly, performers and writers fear misuse of their digital likenesses or creative content, advocating for stringent contractual and regulatory protections to maintain creative integrity and job security⁹.

Support for Australian Film & TV Bodies’ Submission

SPA strongly endorses the positions outlined in the joint submission by the Australian Film & TV Bodies, which includes organisations such as the Australian

³ Butts, T. (2024), *Deloitte: Hollywood Still Cautious Over Implementing Generative AI*, TV Tech, 21 November 2024. Available at: <https://www.tvtechnology.com/news/deloitte-hollywood-still-cautious-over-implementing-generative-ai>.

⁴ Vincent, J. (2020), *Warner Bros. signs AI startup that claims to predict film success*, The Verge, 9 January. Available at: <https://www.theverge.com/2020/1/9/21058094/ai-film-decision-making-warner-bros-signs-cinelytic>.

⁵ Screen Producers Australia, 2024, p.5.

⁶ Butts, 2024.

⁷ Screen Producers Australia, 2024, pp.2-3.

⁸ Pawle, F. (2025), *‘Built on the Back of Stolen Property’: Australian Screen Industry Leaders Urge Government Action on A.I.*, Variety ANZ, 6 June. Available at: <https://au.variety.com/2025/biz/news/australian-screen-industry-unites-against-ai-23479/>.

⁹ Richwine, L. (2023), *Digital doubles, fake trailers: AI worries Hollywood actors before labor talks*, Reuters, 1 June. Available at: <https://www.reuters.com/world/us/digital-doubles-fake-trailers-ai-worries-hollywood-actors-before-labor-talks-2023-06-01/>.

Home Entertainment Distributors Association, Australian Independent Distributors Association and Australia New Zealand Screen Association among the collective.

Specifically, we support their explicit rejection of any Text and Data Mining (TDM) exception, as this would undermine established licensing frameworks and harm creators' economic interests. We also back their call for a clearly articulated risk-based regulatory approach that differentiates between expressive works and higher-risk applications of AI, ensuring that regulation is proportionate and tailored. Finally, we affirm their position that copyright policy oversight should remain firmly within the Attorney-General's Department to maintain coherent, specialised management of creative intellectual property rights¹⁰.

Conclusion

SPA appreciates the opportunity to contribute to the Commission's consultation. We look forward to continuing to assist the Commission throughout the remainder of this consultation process.

For more information please contact Andy Barclay (Director, Industry Growth) on andy.barclay@screenproducers.org.au

¹⁰ Australian Film & TV Bodies, 2025.