Office of AI
Department of the Prime Minister and Cabinet

9 October 2026

Dear Office of AI,

Getting it right: Building AI infrastructure that works for Australia: Consultation paper, September 2026

Social Ventures Australia **(SVA**) welcomes the opportunity to respond to the Consultation paper seeking feedback on the future of artificial intelligence (**AI**) training and large data centres in Australia (**the Paper**).

SVA, a not-for-profit social impact organisation, was created more than 20 years ago to solve challenging social problems. We influence systems to deliver better social outcomes for people by learning what works in communities, helping organisations be more effective, sharing our perspectives and advocating for change. Our vision is for an Australia where people and communities thrive.

SVA recognises the opportunities for Australia made possible through AI and its associated infrastructure. However, without deliberate choices, a minority will receive the gains and control of such infrastructure, while the costs and risks could fall on the people and communities least able to absorb them. Crucially, Australians who are already excluded from, or bypassed by, earlier waves of technology should not bear the cost of developments in AI whilst not being able to share in the benefits.

The Paper covers physical requirements for large data centres and conditions on frontier AI training in Australia.[1] SVA's recommendations attach to three parts of the proposed design: the compliance plans the Paper proposes for large data centres, which we recommend be published; the authorisation frontier developers would need to train large models in Australia; and the inclusion of not-for-profit organisations among the intended users of improved access to computing capacity.

We would also recommend further interrogation on the design and evaluation of these measures, and would welcome the opportunity to provide further information on this work.

SVA Headline Recommendations

Our recommendations bring these measures to life: who gains access to the capability, who bears the costs, whose voice shapes the decisions, and whether the organisations that support communities can use AI safely. Taken together they ask the Government to make large projects show what Australia gets back; to keep a share of computing capacity for public benefit and make sure charities and community organisations can use it; to protect households and community services from carrying the costs; to give communities a real say and hold companies accountable; to tell the organisations that deploy AI what was tested; and to map who is responsible for what and check that it worked.

[1] Department of the Prime Minister and Cabinet, Getting it right: Building AI infrastructure that works for Australia, consultation paper, 17 September 2026, https://www.pmc.gov.au/resources/getting-it-right-building-ai-infrastructure-works-australia

Social Ventures Australia Limited

Gadigal, Suite 5.02, Level 5, 309 Kent St, Sydney NSW 2000 | ABN 94 100 487 572 | AFSL 428 865

info@socialventures.org.au | socialventures.org.au

1. Secure an enduring public return from hosting AI infrastructure and training: the Australian Government should require covered data centre owners and authorised frontier AI developers to specify measurable Australian public benefits in published compliance plans and training authorisations, proportionate to their activities. Governments should apply the same test to public support and allocations of state-owned generation.

2. The Australian Government should establish an ongoing, proportionate obligation on entities controlling covered compute, including frontier AI developers, hyperscalers and neocloud providers, to reserve a share for Australian public-interest purposes, including use by not-for-profits. A public-interest research payment or negotiated in-kind contribution should qualify only if ring-fenced to fund equivalent usable access and support.

3. The Australian Government should require compliance plans to show who bears energy and water infrastructure costs and risks through construction, operation, expansion, delay and exit, with specific assessment of effects on households and community services least able to absorb them.

4. The Australian Government should set an early, accessible and resourced community engagement minimum with States and Territories, including for pipeline projects. Data centre owners and authorised frontier AI developers should make community, employment and skills commitments measurable, negotiated where lawful, assigned to responsible parties and reported against delivery.

5. The Australian Government should set proportionate safety and disclosure conditions for authorised frontier AI developers that give deploying organisations usable information on tested capabilities, limitations and material changes, alongside proactive serious-incident reporting, technical assessment by the Australian AI Safety Institute and a clear route to corrective action.

6. The Australian Government should publish an implementation map with States, Territories and regulators, identifying existing coverage, new duties, responsible entities, monitoring and remedies, including outside the National Electricity Market. Published compliance plans should form a public register, with an evaluation plan and review dates set at commencement.

In applying these, SVA would emphasise three points developed in our supporting analysis: publishing actual environmental performance alongside efficiency ratios; community and sector representation in the body that governs public-interest access; and partnership and agreement-making with First Nations rights holders that preserves native title and cultural heritage processes.

SVA has developed further analysis in response to the Paper, including detailed design proposals for each recommendation, which we would be glad to share. We would welcome the opportunity to discuss it with the Office of AI and with the agencies that will carry the standards into effect. This is our initial contribution on a subject we expect to work on with partners across the social sector.

Yours sincerely,

James Toomey, Chief Executive Officer.

For more information, please contact **Ramon Wenzel, PhD, SVA's Director AI Enablement and Transformation,** rwenzel@socialventures.org.au