



Response to the Consultation Paper 'Getting it right: Building AI infrastructure that works for Australia'

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Submitted by: Gerard Dwyer
National Secretary-Treasurer



About the SDA



The Shop, Distributive and Allied Employees' Association (the SDA) is one of Australia's largest trade unions with almost 200,000 members. Our members work in retail, warehousing, fast food, hairdressing, beauty, pharmacy, online retailing, and modelling.

The majority of SDA members are women (60%), under 35 years (57%), and low-income earners. Retail and food services are two of the three lowest industries for median weekly earnings.

The SDA has a long history of advocating on behalf of members. We do this through enterprise bargaining; making submissions regarding Awards and the NES to provide a relevant safety net; and through numerous submissions made to parliamentary and government inquiries and other important reviews.

The SDA has 10 policy principles that guide our engagement in these reviews. For a list of these, see Attachment A.



Introduction

The Shop, Distributive and Allied Employees Association (SDA) welcomes the opportunity to inform the development of the Australian Standards for AI (the Standards) through this response to the consultation paper *Getting it right: Building AI infrastructure that works for Australia*.

The SDA represents 200,000 workers in retail, fast food and warehousing. Women make up the majority of our membership. A majority of members are also under 35 years of age, and most are on low incomes.

For our members, AI isn't a future issue. It's already here, built into Digital Work Systems. It sets their rosters, allocates their tasks and times their work. More and more, it also decides whether they're disciplined.

We believe that we need to shape AI, not be shaped by it. That means a deliberate policy agenda that uses new technology to strengthen jobs, deepen skills and build a more capable, resilient workforce. The AI transformation is happening fast, and the decisions we take now will set the rules for decades. Innovation matters, but so do secure jobs, fair wages and a decent working life for Australians underpinned by appropriate regulation.

Shaping the direction of AI in Australia

The SDA strongly supports introducing AI laws in Australia's interests, and in Australian workers interests. The SDA recognises that building a sovereign AI capability in practice requires both data centre capacity in Australia and sovereign AI data model training.

In response to the consultation paper the SDA supports and adopts the submissions of the ACTU in full and we also rely on and incorporate in our submission, where relevant to the points in the consultation paper, the following documents:

- SDA Submission To The Joint Select Committee on Artificial Intelligence¹
- For All of Us: Making Artificial Intelligence Work for Working People, John Curtin Research Centre Report no. 13, April 2026²
- Defending Australia: A National Artificial Intelligence Sovereign Capability and Security Agenda for the 21st Century, John Curtin Research Centre Report no. 14, June 2026³

In addition to the points made in the papers referred to above we make the following additional points on sovereign AI models, data training and transparency.

The consultation paper states that:

AI is... a strategic capability that can play a role in strengthening Australia's security, resilience and technological sovereignty. Hosting cutting-edge AI technologies domestically will help Australia capture the benefits of AI while deepening partnerships and improving our ability to understand, influence, manage and respond to emerging risks. This includes enabling risks to be addressed during the early stages of AI model design, including the development and training phases.

The SDA supports this statement: development of the Standards represents a once-in-a-generation opportunity to harness the benefits of AI, including through development of sovereign AI. But the Australian

¹ https://curtinrc.org/wp-content/uploads/2026/10/09092026_SDA_Submission_-_Joint_Select_Committee_on_Artificial_Intelligence_-_Final.pdf

² https://curtinrc.org/wp-content/uploads/2026/04/For-All-of-Us-Policy-Report-No12_DIGITAL-2.pdf

³ https://curtinrc.org/wp-content/uploads/2026/07/Defending-Australia-Policy-Report-No.-14-v3.2-2.pdf?utm_source=jcrc_website&utm_medium=homepage_hero&utm_campaign=defending_australia_report&utm_content=read_now_button

Government must ensure through the Standards that training of AI models on Australian soil is safe, lawful, and fair.

To advance these aims, the Standards should prioritise greater transparency about the data used to train AI models, for models trained and provided in Australia. Such transparency will play a vital role in ensuring that Australian law is upheld, especially legislation dealing with work, copyright, privacy and online safety. In this way, training data transparency can help build a firm foundation of public trust that AI, which is made in Australia, reflects Australian laws and values. This is of particular importance to Australian workers, who will be principal users of AI models.

The SDA recommends that the Standards include a Training Data Transparency (TDT) requirement, which is interoperable with and builds on the TDT laws already operating in leading jurisdictions such as California and the European Union (EU). This would require leading AI companies, who are already issuing similar disclosures in California and the EU, to publish information about the data used for AI training – including, for example, what data has been used, its source, and licensing arrangements.

Whilst building on the models from leading jurisdictions like California and the EU, Australia needs an Australian framework, one that leaves workers with enforceable protections, consumers with genuine transparency, regulators with real technical authority, and the nation with sovereign control over critical systems. Such a framework is essential to ensuring that in training AI models on Australian data we strengthen Australia's economy, democracy and national resilience rather than undermining them. To ensure sufficient transparency and engender trust, an Australian TDT law should include:

- (a) a public disclosure of high-level information about the data used to train AI models, for any model made available in Australia;
- (b) disclosure of more detailed or sensitive information on request to a relevant government body, or a registered organisation in relation to work;
- (c) disclosure of the policies and practices a regulated entity has in place to ensure that AI training complies with Australian law, including copyright and privacy laws;
- (d) auditable independent verification that the standards are being met;
- (e) effective enforcement where there are breaches; and,
- (f) enforcement should be through the regulator or organisation with existing jurisdiction over that sector and/or the Australian AI Safety Institute. For example, breaches with implications for employment or workplace safety enforcement should be by the relevant registered organisations through the Fair Work Commission or a relevant safety tribunal or court. The Australian AI Safety Institute could provide the technical assessment and assistance to those regulators or organisations that may currently lack the capacity to perform them themselves.

Closing note

Australia is approaching a critical juncture in the development and adoption of AI. Without comprehensive laws on AI, Australia risks becoming passive in the face of technological change, allowing its benefits to be concentrated rather than broadly shared across society. It's vital that the government establishes a legislative framework that promotes AI transparency and alignment with Australian laws and values, helping build national resilience, public trust, secure jobs, and ultimately, improved living standards for workers.

Attachment A: Policy Position Principles

SDA policy is driven by providing value to our members whose work is regulated by an industrial system that has been reformed, but had failed them for decades.

Australians need to be supported by an economic system that has working people at its centre. Our predecessors built an industrial system which provided the foundations for shared prosperity. It is now our responsibility to utilise the reformed industrial framework for the current and future generations. Decades of concerted attacks on our industrial relations system saw inequality grow, and economic and political power has further concentrated in the hands of a few.

The world of work has changed and will keep changing. There is an unprecedented intersection between work and care. Income and gender inequality have combined to increase disadvantage. Predictable, secure hours of work that provide a living wage are at the centre of decent work. But there has been growth in insecure work, digitalisation is now a matter of course, safety concerns have persisted, and automated, digital and generative technologies must be shaped to enhance, not undermine, decent work.

We believe that fundamental not incremental change is needed. In contributing to policy, we seek to drive a new system that acknowledges the change that has occurred and will be fit for purpose in the emerging world of work.

The SDA engages in topics that help drive this agenda and we are guided by ten principles that we believe will create value for our members. Those principles are:

- 1. Address Inequality & Enshrine Fairness**
Minimum standards must be set and adhered to.
- 2. Equity & Empowerment**
All workers must be supported to progress so that no-one is left behind.
- 3. Mobility & Security**
A socially successful economy must provide opportunity for all, regardless of their background. Systems must be built in a way that support success and adaptation in a rapidly changing world of work.
- 4. Delivering Prosperity & Growth For All**
A foundation for prosperity and economic growth must be achieved.
- 5. Protection in Work & Beyond**
Workplaces and the community must be healthy and safe for all workers and their families during and beyond their working lives.
- 6. Workers Capital & Superannuation**
Workers capital and superannuation must be an industrial right for all workers and treated as deferred earnings designed for dignity and justice in retirement.
- 7. A Strong Independent Umpire**
A strong, independent, cost effective and accessible industrial umpire and regulator must be central to the future system of work in Australia.
- 8. Protection & Support for Our Future**
Protecting and supporting our future requires a strong and vibrant retail industry and supply chain. The sector must provide decent work with fair and just remuneration and contributing to the economy including through skilled workers.
- 9. Work & Community**
Work is a fundamental human activity that provides for personal, social and economic development. Work as it operates in community must build and protect a balance between life at work and life so that workers can contribute to society through the wider community.
- 10. Institutional Support for Collective Agents**
Institutional support must provide for collective agents (registered organisations) in all industries so that they are recognised, enshrined and explicitly supported as central to the effective functioning of the system.

Details of specific policy positions can be discussed by contacting the SDA National Office.

