



Record of Submission

Australian Government Consultation

Getting it Right: Building AI Infrastructure That Works for Australia

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Submitter

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Representation

Other business or company
Urbyte Pty Ltd
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Perspectives Selected

- ✓ Australia wide
- ✓ Metropolitan or city communities
- ✓ Regional and remote communities
- ✓ International



Topics Selected

- ✓ Regulatory framework
- ✓ Data centre capacity thresholds
- ✓ Application of the standards
- ✓ Energy
- ✓ Water
- ✓ Other infrastructure
- ✓ Land, location and communities
- ✓ Skills and training
- ✓ Safety and security
- ✓ Economic benefits, research and innovation
- ✓ Copyright and culture



Additional Regulatory Reform Position

Australia should become a trusted destination for AI development through transparent accountability, measurable public benefit, regulatory certainty and clear governance expectations.



Core Submission Position

Australia has an opportunity to become a global leader in trusted AI infrastructure and AI development.

Success should be measured not only by investment attracted, but by evidence of value created for Australians.

The submission consistently advocates:

- Evidence-based accountability
- Verification before conclusions
- Transparent reporting
- Demonstrable public benefit
- Governance before execution
- Traceable decision-making
- Proportionate regulation
- Investment certainty
- National capability building

KEY THEMES SUBMITTED



Managing Growth in Data Centres

- Balance investment attractiveness with measurable public benefit.
- Avoid relying solely on compliance obligations.
- Create systems that connect: commitments → actions → outcomes → supporting evidence.



Capacity Thresholds

- Energy capacity is an appropriate primary threshold.
- Additional metrics should include:
 - Electricity consumption (MWh)
 - Water consumption
 - Compute intensity (FLOPS)
 - Cumulative organisational capacity



Tiered Regulation

- Obligations should scale according to actual impact.
- Larger facilities should face increased transparency, reporting, and accountability requirements.



Development Pipelines

- Projects already in planning, approval, or construction should not be excluded merely because they commenced before standards were introduced.
- Future impacts should be assessed rather than relying on arbitrary cut-off dates.



Compliance

- Core transparency and reporting obligations should commence immediately.
- Operational obligations may be phased according to practical delivery constraints.



Energy & Renewable Infrastructure

- New renewable capacity (generation, storage or firming) that would not otherwise have been delivered.
- Certificate obligations aligned with tiered framework.
- Time matching: peak demand, system stress, grid constraints.
- Support on-site generation, storage, demand response, flexible load.
- Public reporting focusing on verifiable outcomes.



Water Management

- Water efficiency: performance standards, WUE metrics, NABERS benchmarks, continuous improvement.
- Source hierarchy: recycled water, non-potable water, potable water as last resort.
- Public reporting: total consumption, peak demand, sources, recycled use, drought resilience, impacts.
- No material impact on local water security or drought resilience.



No Net Costs to Consumers and Communities

- Large data centres should not externalise costs onto households, businesses, communities or governments.
- Use transparent reporting, evidence-based impact assessment, clear accountability and cost attribution.
- Community benefits defined early, measurable, transparently reported with verifiable evidence.



Community Engagement and Benefits

- Engage early and continuously through project life with nearby businesses, local communities and First Nations stakeholders.
- Benefits may include: employment, skills, telecommunications, infrastructure, environmental outcomes.
- Site selection considers actual & community impacts, infrastructure availability, land-use competition.



Skills and Workforce Development

- Support apprenticeships, traineeships, cadetships and industry partnerships.
- Partner with TAFE and universities.
- Focus on technical roles, engineering, cybersecurity and digital infrastructure.
- Prioritise underrepresented groups.



AI Training Conditions, Safety and Security

- Principle-based, technology-neutral, outcome-focused regulation.
- Developers share material capabilities, safety incidents, security risks, testing outcomes and compliance obligations.
- Safeguard privacy, IP, commercial confidentiality and national security.



Research, Innovation and Capability

- Priorities: compute access, local research capability, partnerships, talent, commercialisation, Australian-owned capability.
- Mechanisms: compute reservation schemes, research partnerships, training commitments, public-interest research programs, in-kind contributions.
- Public interest compute: transparent, equitable, public-benefit focused with clear allocation criteria.



Final Submission Statement

Australia has an opportunity to become a global leader in trusted AI development. Success should be measured not only by investment attracted, but by evidence of value created for Australians. Transparent governance, evidence-based accountability and demonstrable public benefit can help ensure AI investment strengthens Australia's economy, capability, resilience and long-term prosperity.



Supporting Document Submitted Evidence-Based Accountability for AI Infrastructure (PDF)

- Principles:
- Verification Before Conclusions
 - Governance Before Execution
 - Traceable Decision-Making
 - Demonstrable Public Benefit

Submitted as supporting evidence alongside the consultation response.

