

An Exploratory Study of Initial Policy Responses to Generative AI in Creative Industries: Evidence from Australia, Canada, Singapore, and the UK

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Abstract

From a comparative perspective, this paper explores how the governments of the UK, Canada, Australia, and Singapore initially responded to the deployment of generative artificial intelligence (AI) in the creative industry (CI). It addresses how these governments balance the cultural goals of protecting the copyright of domestic artworks during the process of text and data mining and the economic goals of developing new AI services and products. This paper explores relevant documents, including campaign statements of artists' associations, reports of relevant national and local public authorities, national newspapers, and art magazines. After discussing the initial responses by the four governments, the article highlights that their policies are constructed by (1) artists' political resources to negotiate with relevant authorities, (2) dynamics and power balances between public authorities, and (3) historical paths constructing governments' approaches towards the CI and cultural exemption.

Keywords

Creative industry, intellectual property, generative AI, comparative policy research

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Introduction

In 1998, the UK Labour government produced the Creative Industries Mapping Document, defining creative industries (CIs) as those that create employment and wealth "through the generation and exploitation of intellectual property" (IP) (the UK government 2001, 5). As this definition highlights, CIs and IP are closely related. To generate and maximize IP, including the copyrights of cultural and creative works, national governments and international organisations (e.g. the World Intellectual Property Organisation and the World Trade Organization) have legislated and implemented diverse policies and laws. The development of IP policy in CIs has never been straightforward—rather, it has frequently caused controversies and debates over value judgements and consensual making. Some of these complex examples include how to balance the protection of copyrights and creative freedoms (e.g., Parc 2023; Parc and Messerlin 2021) and how to draw the boundaries between piracy and fair use by fans (Schroff 2020). New digital technologies that enhance the duplication and circulation of cultural content further accelerate the debates and policymaking surrounding IP rights in CIs.

This paper spotlights the latest challenges in this area: the emergence of generative artificial intelligence (AI) in CIs and countries' cultural policy responses to it. Generative AI, a popular service in artistic outputs, is dramatically expanding and rapidly changing the business models and processes of making creative content. Generative AI offers platforms and instruments to create competitive artworks based on large-scale text and data mining. Generative AI, such as Midjourney and ChatGPT, can thus be competitive content generators for creative industry workers. However, creative industry workers and governments are driven to act against the text and data mining that develops these AI services, which access online content without paying copyright licensing fees. This situation raises significant questions surrounding whether governments should force AI programmers to pay licensing fees that can benefit workers in CIs but hinder the potential development of generative AI, how and to what extent governments should intervene with AI, and debates on IP in CIs.

This paper comparatively explores how governments have initially responded to the emergence of generative AI in CIs. It addresses how these governments balance cultural goals to protect domestic artworks from copyright exemption in text and data mining and economic goals to develop domestic AI services; it includes case studies of four commonwealth countries where English is commonly used in their policy documents and national CIs: the UK, Australia, Canada, and Singapore. The analysis centres on four countries selected to illustrate contrasting and diverse approaches within the English-speaking world. While this focus is another clear limitation—precluding any generalized conclusions about global trends—it highlights the need for future research to incorporate a broader range of national contexts. Even so, the cases studied here reveal a central dilemma for governments: how to balance the protection of artists' rights with the promotion of generative AI, and they offer insight into possible directions for policy intervention. This paper examines initial policy responses from 2016 to 2023, a period when artificial

intelligence began attracting the attention of policymakers and cultural practitioners, and when generative AI technologies made their first profound societal impacts. Focusing on this early stage of AI policymaking is an inherent limitation, as the relationship between cultural policy and generative AI remains unsettled and continues to evolve. Nevertheless, documenting these initial responses and presenting preliminary findings is valuable for capturing both the transformative effects of generative AI and the diverse policy approaches emerging at the time.

The remainder of this paper is structured as follows. The second section presents the theoretical framework—comparative cultural policy and external shocks—and relevant stakeholders at the state, market, and civil society levels. It posits that the comparative approach to conceptualizing the models or archetypes of national cultural policies enriches the understanding of the discourse and policies on AI and CIs amid the initial and rapid development of new technologies. The paper's third section overviews the relations between generative AI and cultural policy by reviewing the recent technological development and political actions, including court decisions and national IPOs. Notably, this section shows that AI influences input—in this case, learning from existing artworks with copyright exception—and output—making competitive content with generative AI programs. The fourth section addresses how four countries—Australia, Canada, Singapore, and the UK—contrastingly responded to the emergence of generative AI. It focuses, on the one hand, on these governments' motivations and actions when intervening with copyright and the AI industry and, on the other, the artists' voices and campaigns against generative AI. The paper's final section conceptualizes the policy responses from the four countries. It outlines significant factors that influence the initial policies for AI in CIs by investigating the historical paths, institutional arrangements, and relations between the public authorities and artists' associations.

Theoretical Framework: Comparative Cultural Policy and the External Shock

A comparative approach is broadly applied in public policy scholarship 'to understand and explain why divergent policies are adopted in different contexts and why they lead to a variety of outcomes' (Dodds 2018, 12). For media policy scholars who systematically navigate these issues, comparative policy research offers analytical toolkits for understanding, awareness, generalization, relativization, and alternatives (Esser and Hanitzsch 2012; Esser 2019). Among those functions of comparative studies, the crucially significant advantages for cultural policy scholarship are this approach's ability to glean fresh insights and understanding of overlooked factors or relativisations of national policy practices. Several works within cultural policy scholarship help categorize and theorize the variations of national cultural policies (e.g., Cummings and Katz 1987; Chartrand and McCaughey 1989; Rius-Ulldemolins et al. 2021; Rosenstein 2021; Lee et al. 2021; Hylland et al. 2022). Of these sources, Rosenstein (2021) particularly emphasises the shortcomings and advantages of archetypes (i.e., models) in cultural policy. These archetypes could oversimplify national

cultural policies by highlighting single aspects at a time. However, these archetypes are also helpful, offering insights into the ideas about the value of culture in each context. In this sense, the modelling of national cultural policy is relevant and significant for this paper, which investigates how the copyrights of artistic works and AI are evaluated and conceptualized in each national context, thereby shaping the policies and discourses on AI in CIs.

In comparative research, an external shock, as a shared experience, is often spotlighted as a shared crisis experience. These circumstances thus present an opportunity for researching cultural policy from a comparative perspective. As Lee et al. (2021) discuss in their research on the varied responses to the COVID-19 crisis in East Asian countries, the intensive shock of the pandemic should be examined as a potential "critical juncture" that has caused fundamental changes in cultural policymaking. Similarly, existing scholarly works comparatively analyze the impacts of marketization and deregulations on cultural policy and sectors in diverse national contexts. The COVID-19 pandemic furthered debates on comparative cultural policy. Through the frame of a shared experience, scholars systematically analysed the global pandemic's impacts on national cultural policies that were shaped in local political—economic contexts (e.g., Hylland et al. 2022; Lee et al. 2021).

This paper seeks to advance further the existing debates on comparative cultural policy and crisis by investigating generative AI's impacts on CIs and national governmental efforts to promote and regulate AI's use and development in cultural content creation. The selection of the four countries in this paper is intended to highlight the differences and enable a comparative approach. These countries share fundamental similarities: the development of a post-industrial economy, the exposure to global economic competition, English as a common language, and their political systems. Furthermore, comparing these countries and highlighting their diverse responses to the new controversy over AI and IP in CIs is justifiable as their copyright laws are relevant to each other. The Singapore Modern Copyright Act (1987) is applicable and based on the Australian Copyright Act and UK Copyright Law, as one example. Given these connections, it is meaningful to compare how these countries have variously responded to the shared shock of generative AI and articulate what factors caused these changes and their diversity. Comparing these countries allows this paper to identify and closely examine how they responded to the same external shocks and the critical factors that influenced their reactions.

Flew et al. (2016) presented a triangle model of media policy formation that provides a valuable starting point to map the relevant stakeholders and keywords and define the scope of this paper's thesis; they conceptualised the three most prominent sectors in media policy as "the state (the core executive), the market (private and business actors including the media) and civil society (voluntary and community sector actors)" (Flew et al. 2016, 7). The division of stakeholders into these three categories has been applied in existing general research on cultural policy (e.g., Mingant and Tirtaine 2018). This paper focuses on the roles of public sector actors (i.e. national and local governments and ministries of economy, culture, and IP offices), the market (i.e., the private business companies in the technology industry and CIs) and civil society (i.e., artists' groups and media platforms working

primarily for non-commercial purposes). Then, their interactions and negotiations in the policymaking process are investigated.

Generative AI and Cultural Policy

Defined as "the analysis of data to model some aspect of the world" by the UK's Office for Science (2016, 5), AI has substantially impacted CIs worldwide. Notably, generative AI has changed how CI workers produce and profit from their cultural and creative outputs through inputting and outputting the content. For instance, ChatGPT, developed by OpenAI for generative language output, and Midjourney, developed by Midjourney, Inc. for image-generating AI, play significant roles in making text and image outputs based on the creators' instructions. The news that Jason Allen used the Midjourney AI to create his output and won an award in the Colorado State Fair Fine Arts Competition in 2022 (McGill Business Law Platform 2022) indicates that the quality of generative AI can be impactful in the fine art sector. Similarly, Boris Eldagsen won and rejected an accolade from the Sony World Photography Awards with his DALL-E2-generated photo, 'The Electrician' (Euro News 2023). For editing and post-production, Runaway and Adobe AI Assist offer AI-driven services for video content producers. These tools offer opportunities for newcomers to provide original content generated by these AI services, which have started to supply AI-generated content on digital markets like Pixiv (a Japan-based illustration-sharing community) and DL Site (a digital content selling platform).

The development and use of generative AI in CIs has significantly impacted and been impacted by cultural policy, especially IP policy. Generative AI inputs large datasets using text and data mining (TDM) systems, which often include copyright-protected alongside AI-generated content, to produce outputs in the creative economy, including music, illustration, comics, and video, which often prove impactful and competitive. Content creation and using IP inform pivotal policy agendas on which governments should act. For instance, in the US, the US Copyright Office's decision not to recognize copyright for AI-generated comic art could influence the careers and incentives for forthcoming artists. National regulations on AI and IP rights critically influence profitability and the potential of cultural outputs from AI. Indeed, the US Copyright Office decided not to allow the registration of AI-generated graphic art in the comic *Zarya of the Dawn*, to which Kris Kashtanova contributed the text and story while generating its art with AI.

Finally, protecting existing cultural outputs from TDM systems relies heavily on national legal frameworks and the government's political decisions. On the one hand, the development of generative AI is a significant target for copyright exemption attempts. On the other hand, the Cabinet Office or the Ministry of Economics tends to advance the active use and development of generative AI services as a promising instrument to innovate and expand the creative economy.

Initial Policy Responses in Australia, Canada, Singapore, and the UK

This section explores how the governments of Australia, Canada, Singapore and the

UK responded to generative AI emerging in CIs. For that purpose, this paper employs an array of published documents from the relevant stakeholders in the states, markets, and civil society, including national newspapers (e.g., *The Globe and Mail* in Canada, *The Guardian* in the UK), public authority reports (e.g. Australian Copyright Council and Creative Australia in Australia, the Department of Culture, Media and Sport and the Department of Industry, Science and Resources in the UK, Canadian Heritage in Canada), and publications from artists' associations (e.g., Equity in the UK, the National Association for the Visual Arts and the Australian Writers Guild in Australia, the Screen Composer's Guild in Canada) and reports from international organisations like the World Intellectual Property Office (WIPO). Combining keyword searches with systematic document analysis, this paper examines policy documents referring to generative AI within the context of cultural and creative industry policies. The analysis seeks to highlight the distinctive features of national cultural policies by emphasising their differences, thereby offering archetypes of policy approaches. While these archetypes inevitably simplify complex policy initiatives, they capture the core characteristics of the initial responses observed in the four countries studied. Future research should undertake closer, more in-depth analyses of each country, presenting a more nuanced and multifaceted picture of AI and cultural policy, incorporating longer historical perspectives and tracing policy developments beyond 2023.

Australia: Active CCI Workers' Campaigns and an Inactive Government

Australia is an early adaptor of creative industry discourse and policy; its Creative Nation (Australia's Department of Communications and the Arts 1994), implemented by a Labour government, linked support for the arts to economic developments. Following that, there have been controversies or "cultural wars" (Caust 2015, 168) between artists or intellectuals calling for arts policy and conservative politicians. Under the existing rivalry between major parties, the Australian government occasionally experienced suspensions and delays in policy responses to cultural sectors. In its latest document—*Revive, Australia's Cultural Policy for the Next Five Years: A Place for Every Story, A Story for Every Place*—the Australian government claimed that IP, including copyrights of cultural outputs, is supported to incentivize the creation of new cultural material while allowing reasonable and equitable use of copyright material in the public interest' (Australian Government 2023, 57). This approach indicates that the Commonwealth is more inclined to provide IP access and encourage active use than to restrict or protect the use of creative IP. Public resources occasionally emphasize the economic potential of IP rather than the protection of cultural and creative works; for example, the Australian Copyright Council published a press release based on the PwC report overviewing the copyrights in Australia. In it, the importance of the copyright is exclusively explained from an economic perspective, as its title, "Copyright's Importance to the Australian Economy," demonstrates (Australian Copyright Council 2020). The Commonwealth's economic-centred approach and discourse are broadly reflected in Australian public documents, including *Growing Australia's Creative Industries Position Paper*, published in March 2022. The Australian Broadband Advisory Council, working for the government, published a document that presents the need to expand and support

IP as discussed and justified only from the perspective of monetization and economic development. Given this context, the government's lack of initiative to protect domestic CIs is understandable.

Although the government of Australia has been inactive, diverse groups or unions of CCI workers have collectively acted to install regulations on the use of generative AI to protect the copyrights of the Australian cultural industries and CIs. The National Association for the Visual Arts of Australia surveyed artists and creators about how AI impacts their creative works. Later, in August of 2023, the Media, Entertainment and Arts Alliance (MEAA) called for the government to act and stop giving tech companies exceptions from copyright laws in training generative AI. Then, the Australian Publishers Association published a statement calling for the government's action on copyright exemptions for TDM systems to safeguard publishers' rights, and the Australian Writers Guild voiced concerns and opposition against the underregulated use of AI in CIs.

Canada: Protective and Responsive Actions by the Government

Canada implemented a series of protective policies to secure the rights and outputs of cultural sector workers. The Canadian government discussed cultural exemptions in international agreements to protect local cultural products and content from global media competition. Canada's policies on AI regulation in CIs are comparable to other debates on CIs and copyright. As early as March 2018, the House of Commons Standing Committee on Canadian Heritage published a report addressing the gaps between CI workers' returns and economic returns made from domestic CIs, concluding that the rights of creative workers should be extended and their IP rights should be protected.

Canada's protective approach is evidenced in how the relations between AI and IP are framed and discussed: Large media platforms discuss whether AI-generated content should be protected as IP content rather than how to restrict or ban AI-generated content from platforms. The Canadian government has implemented protective policies to stop unconditional TDM systems from collecting output from cultural and creative industry workers in Canada. The Canadian government launched a consultation committee to hear the public's opinions and make policy proposals based on them. This approach indicates that the Canadian government was actively and cautiously collecting the CCI workers' voices in shaping its AI and CI policies. The Canadian case shows that the Parliamentary Committees are leading in forwarding the policy discussion and research on CIs and copyright from a supportive and protective viewpoint.

The Canadian government closely communicates with and consults the private sector actors from civil society and business in legislating and modifying the IP policy related to the CIs. For instance, when the 2019 Statutory Review of the Copyright Act was prepared, the House of Commons in Canada broadly consulted relevant CCI stakeholders as witnesses, including writers' associations, filmmakers' associations, and educational and commercial institutions. In response to the government's consultation, private sector actors, such as the Screen Composer's Guild in Canada, clearly demonstrate their intention to cooperate with the government. Such a historical path built the cooperative climate between the

government and private sector actors, resulting in the swift and consensual development of copyright protection against generative AI in Canada.

Singapore

Singapore exemplifies another case prioritizing the economic impacts of IP on the CI and avoiding a protectionist or restrictive approach to copyright exceptions for generative AI using TDM systems. IP law in Singapore has been legislated and formalized in response to the external pressure to adopt international standards (Khoo 2010). Singapore has since positioned creativity as a central mission for the nation. In addition, the WIPO (2004) has published reports highlighting the connections between economic impacts and IP in CIs, including *The Economic Contribution of Copyright-Based Industries in Singapore and Copyright and the Creative Industries: Role of Collective Societies*.

Characterising Singapore's copyright policy is the government's keen focus on technological aspects, as shown by the government's installation of the Copyright Act of 2021 and responses to the new practices of digital content use and access, which have caused controversy over copyright infringements and the concept of personal use. Most significantly, the new act permits the use of works for computational data analysis that include: "(a) using a computer program to identify, extract and analysis information or data from the work or recording; and (b) using the work or recording as an example of a type of information or data to improve the function of a computer program about that type of information or data" (Singaporean Government 2021, Section 243). This provision allows AI developers to utilize digitally accessible data to develop their generative AI services. In this approach, Singapore's primary agenda is to encourage innovation so that AI development being hindered by efforts to protect artists' works is unfeasible. As Cheng-Davies (2021) discusses in an analysis of moral rights, the Singaporean government's copyright law is oriented towards economic performance in CIs rather than the cultural or artistic values of creative outputs.

The response to the generative AI in the Singaporean CIs resonates with this economically motivated approach. Indeed, the protection of creative works from cultural perspectives is barely discussed or is overshadowed by economic initiatives to welcome generative AI development with copyright-free TDM systems. The significant difference between Australia and Singapore is that Australian artists and associations have actively called for government intervention with copyright protection in CIs. In contrast, few such articles have been published by CI workers in Singapore.

The UK: Pragmatic Unions and the Government's Flexible Approach

The UK government's approach towards new technology and CIs is flexible. Initially, the UK government welcomed the extensive use of generative AI (as an 'AI superpower' strategy), resonating with the general de-regulatory and economic-driven approach in digital cultural policy (Oakley 2023). The government proposed an ambitious plan to make the UK "an AI superpower" and encourage the development of domestic AI services, including one organisation's command paper, which proclaims "a pro-innovation

approach to AI regulation" (Department for Science, Innovation and Technology 2023). However, the government has recognized various contextual differences and sector-specific conditions in regulating and promoting AI. Accordingly, CI sectors and Department for Culture, Media and Sport have expressed the need for more cautious AI use and more stringent IP protection from domestic cultural sectors. A group of members of parliament (MPs) in the Culture, Media and Sport Committee warned of the government's initiative to exempt the TDM systems from copyright protection:

We are pleased that the government has been listening to stakeholders on text and data mining intellectual property for commercial benefit, and we are encouraged that ministers are looking again at [it]. The current framework (...) provides an appropriate balance between innovation and creator rights. (House of Commons Culture, Media and Sport Committee 2023)

Subsequently, UK Music, an association of UK music industry workers, welcomed the proposal and advocated for more robust copyright protections in CIs.

The UK's general policy goal is to achieve a "balance between innovation and creator rights" (House of Commons Culture, Media and Sport Committee 2023); its approach was neither wholly protective nor liberationist. The 'Connected Tech' report is a clear example of the UK's approach to AI and IP: Although it admits the necessity of protecting and respecting copyright, the report did not adopt an unconditionally restrictive or protective approach to abandon copyright exemptions. Instead, it attempts to bridge the divide between CI workers and new technologies by showcasing successful examples and case studies. CI policy documents in the UK often catalogue these successful cases to offer bright and optimistic views about the future of technologies and creativity in the CCI (e.g., DCMS's "Boundless Creativity" report in 2021). The UK government has remained cautious of the impacts of technology on CIs and conducted relevant research and consultation. The latest example is a report commissioned by the UK government's Centre for Data Ethics and Innovation that interrogates the impacts of algorithm-driven service on the music industry. A blog entry from NESTA (National Endowment for Science Technology and the Arts, a British charity foundation for supporting innovation) in 2020 likewise shows that the use of AI in CIs has previously been spotlighted; at that time, the artists discussed approaches on how to utilize AI technology.

Interestingly, one union, Equity, implemented a balanced approach by making its AI Toolkit to help its members and share know-how on protecting their rights while offering a clear pathway for its members to lobby and seek legal action, thus reflecting the artists' voices on local politicians and government. This approach has helped to expand communication channels between the government and artists. Given the UK's existing copyright policy, this approach from practitioners and the government is sensible. Indeed, the government has addressed culture and technology as powerful allies and actively sought for technology to be applied in cultural activities (Wright and Gray 2022).

Table 1. Timetable

Source: Designed by the author.

November 2016	The UK's Office for Science published a report, "Artificial Intelligence: Opportunities and Implications for the Future of Decision-making."
June 2020	The Australian Copyright Council commissioned a report investigating the impacts of copyright on the Australian economy.
September 2020	The Intellectual Property Office (IPO) in the UK announced the roadmap to encourage the use of AI to make the UK a "global leader in AI technology."
June 2022	In the UK, Equity launched a new campaign to survey the impacts of generative AI and published a report, "Stop AI Stealing the Show." It explicitly claimed the government acted to restrict TDM systems without copyright protection.
February 2023	The Centre for Data Ethics and Innovation, commissioned by the UK government, published "The Impact of Algorithmically Driven Recommendation Systems on Music Consumption and Production."
July 2023	In Australia, the National Association for the Visual Arts conducted a questionnaire with artists and creators on how AI impacts their creative works.
3 August 2023	In Australia, the Media, Entertainment and Arts Alliance commented that the government should stop exempting tech companies from copyright laws to train generative AI. It claimed that the AI tools could be a unique threat to CCI workers.
30 August 2023	The UK's House of Commons Culture, Media and Sport Committee published a report titled "Connected Tech: AI and Creative Technology." It raised concerns about TDM systems' impacts on CIs and expressed the need for more supportive policies for CIs and the constructive use of AI in CIs.
	Based in the UK, the UK Music Chief Executive welcomes a Parliamentary Report urging the abandonment of copyright exemption for AI developers' TDM systems. The statement called for tighter protection of copyright.
27 September 2023	Australian Publishers Association called for the government's action to TDM systems copyright exemption to protect publishers' rights.
4 October 2023	The Australian Writers Guild voiced concerns and opposition against the underregulated use of AI in CIs.
12 October 2023	The Canadian government released a consultation paper on the implications of generative AI for copyright and CIs.

Table 2. Initial Responses to Generative AI Models in CIs

Source: Designed by the author.

Canada	The Canadian government is cautious about the risks and responsibilities regarding the use of AI and Data, as the Artificial Intelligence Act (2022) mentions the responsibilities of AI development. The protective approach from the government side was demonstrated when it called for the consultation paper on the implications of generative AI for creative industry copyrights. The Canadian government is responsive and protective of domestic CCI workers.
Australia	Associations of artists and media workers raised concerns about the risks of copyright exemption and called for government regulations. However, the government did not discuss or apply new restrictions and highlighted the general economic potential of generative AI. The Australian government is relatively inactive despite diverse unions' voices for the government's regulation of the AI copyright exemption.

Singapore	Singapore's government has not taken protective action against the TDM systems copyright exemption; instead, by offering extensive copyright exceptions, it has modified its IP policies to encourage technological innovations. The CI workers or associations have not presently mounted significant opposition campaigns.
UK	The government initially encouraged the active use of AI by offering IP exemption. Significantly, the government claimed sector-specific regulations. Nevertheless, the DCMS warned of violating creative industry IP and claimed tighter regulations, and private sector actors (e.g., UK Music) welcomed the DCMS proposal.

Discussion: What Shapes Government Responses to Generative AI in CIs

The governments' responses to generative AI's use in CIs in the selected four countries can be explained by the following variables: (1) artists' political resources to negotiate with relevant authorities, (2) the dynamics and power balances between public authorities, and (3) historical paths that construct the governments' approaches to the CI and cultural exemption. The preceding comparative analysis of the four countries demonstrates how these governments' initial responses to the use of generative AI in CIs have been shaped by diverse dynamics between public authorities, the business sector, and artists' associations working in civil society. Although generative AI is an emerging, unprecedented opportunity—or crisis—for the cultural sector, the government's reaction was structured and conditioned by the institutional arrangements or historical paths that characterize their national cultural policies. For example, the protective approach of the Canadian government resonates with its preceding cultural protections in international trade agreements or intangible heritage protection. It swiftly and spontaneously launched a public hearing to understand the concerns and questions of artists about restricting TDM systems and protecting the IP rights of Canadian creators. This protective approach is evidenced in the following discussion about whether or in what way the copyrights of AI-generated content should be provided in Canada.

In the UK, the autonomous and dynamic relations between different government ministries are spotlighted; the government's main characteristic in this area is its flexibility. Unlike Canada, the UK government has been more active and welcoming to new technology and aims to promote it as a new opportunity. Its digitalization initiatives exemplify this active approach (Wright and Gray 2022). On the one hand, the Ministry of Economy sought the unconditional copyright exemption for TDM systems to foster the development of generative AI and make Britain an AI powerhouse. On the other hand, the DCMS, representing the cultural sector, identified the need to protect artists' creative outputs from the TDM systems and the generative AI programs' learning algorithms. The government expected different sub-sectors to establish their own rules and protocols about AI and IP, indicating the UK government's pragmatic approach to new technological issues. Consequently, the DCMS Committee report concluded that the government should act to protect the artists' copyrights in AI development. The UK's policy response was scaffolded by active and constructive relations between artists' associations, such as Equity, and responding government agencies. The Equity and other artists' associations raised concerns over copyright infringements in making and using AI and called for government

interventions. Active interactions between civil society actors and public authorities characterise the tradition of the UK's cultural policy (e.g., Terui 2023). At the same time, the artists in the UK took a pragmatic and constructive approach to generative AI; for example, Equity has published AI toolkits and offers practical advice to its members.

Australia's and Singapore's governments have taken no significant statements or actions to protect the copyrights of cultural works against the TDM systems and the development of generative AI as of October 2023, when this article was submitted. In Australia, diverse creative industry workers, including journalists, publishers, and illustrators, have repeatedly asked the government to stop the copyright exception and protect artists' work. These initiatives prove the active involvement of the CI workers with political and economic agendas. Nevertheless, the Australian government tends to feature economic growth with AI and encourages the development of generative AI, as the Ministry of Economy made an official statement about that. Creative Australia, a government advisory council dealing with cultural and CIs in Australia, could be a potential stakeholder actively referring to AI in the CIs. Nevertheless, its statement and action on protecting artworks were less explicit or determined than Canada's and the UK's.

In Singapore, unlike other countries, artists' associations or cultural policy organisations are not active negotiators in discussing AI and IP policies. The IPO in Singapore plays a central role in navigating the national strategy of generative AI and IP. It published a national IP strategy by 2030 and barely mentioned the concerns related to CIs. Instead, the Singaporean government is explicitly oriented toward the active use and development of generative AI, making the protection and exemption for CIs challenging to consider as an agenda. The approach of the Singapore IPO and government toward the generative AI in CIs reflects their developmental and economy-oriented cultural policy. Interestingly, in responding to such a government non-protectionist approach, workers in Singapore's CI mainly discuss how to utilise AI technologies and adopt their outputs. The discourse and mediascape in creatives in Singapore feature the survival strategy and successful examples of creative outputs from AI.

Conclusion

From a comparative perspective, this paper has explored how the governments of the UK, Canada, Australia, and Singapore initially responded to the emergence of generative AI in CIs. It has addressed how these governments balance cultural goals to protect domestic artworks from copyright exemption in text and data mining and economic goals to develop domestic AI services; likewise, it has explored relevant documents published by artists' associations, national IPOs, relevant national and local public authorities, newspapers, and art magazines. After discussing the initial responses by the four governments, the article points out that their policies are constructed by (1) artists' political resources to negotiate with relevant authorities, (2) dynamics and power balances between public authorities, and (3) historical paths constructing governments' approaches toward the creative industry and cultural exemption. While research on digital cultural policy lists the new technologies that

could cause policy change (Hylland and Primorac 2023), the research on initial responses to generative AI so far posits that the emergence of this new technology has not brought about policy changes; the pre-setting patterns are nevertheless repeated in each national context.

The advantage of comparative research is that it broadens our perspectives about possible scenarios and variations of AI and IP policies in CIs. For instance, Equity in the UK claimed that the existing copyright law is outdated and should be revised to respond to the radical changes triggered by new technologies in favour of creative workers' copyrights. However, the evidence from Singapore shows that such a revision could cause hardships rather than merits to the CI as the Singapore government approved the use of artistic works for AI program development. The comparative research can showcase a variety of possible scenarios and enables policy advocates to prepare and plan for their action plans.

This paper has made significant and original contributions to the research on the latest trends in the CI and IP policies and the theoretical discussion on comparative methods in cultural policy research. Nevertheless, this paper needed to focus on the cases from chronological or geographical perspectives to tackle the significant and ongoing theme. The report focused on the trends for the previous three years (2020 October to 2023 October) and four significant countries: the Commonwealth of Australia, Canada, Singapore, and the UK. It is beyond the scope of this paper to systematically cover large numbers of cases or discuss the long-term trends comprehensively. Research on generative AI and cultural policy should be elaborated in the future by incorporating more diverse national policies from a comparative perspective.

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