



JOINT SELECT COMMITTEE ON ARTIFICIAL INTELLIGENCE

Submission: Australian Electoral Commission

The Australian Electoral Commission (AEC) has been closely monitoring the evolution and impacts of artificial intelligence (AI) technology and welcomes the opportunity to make this submission to the Joint Select Committee on Artificial Intelligence. The purpose of the submission is to build on concerns raised in the [AEC's 2024 submission to the Senate Select Committee on Adopting Artificial Intelligence](#) and outline the AEC's cautious, limited adoption of AI at present.

The AEC's primary interest when considering the use and impacts of AI is in maintaining public trust and confidence in electoral processes. As Australia's federal Electoral Management Body (EMB), the AEC's focus is not only staying abreast of the adoption of AI within government and by EMBs internationally, but also on how AI may affect electoral integrity, voter understanding, confidence in democratic institutions, and the ability of electors to identify and access authoritative information about the electoral process.

The AEC's cautious approach to adopting AI

In line with Whole of Australian Government (WoAG) requirements, the AEC's use of AI is outlined in the [AEC's AI Transparency Statement](#).

Federal elections are fundamentally manual processes. Physical ballot papers are completed with a pencil or pen and counted in front of candidate-appointed scrutineers. This process has been trusted for over a century and any changes to our voting process are a matter for Parliament to carefully consider.

However, historically the AEC has very effectively utilised advances in non-AI technology to support those manual processes, for instance our carefully scaled use of electronic roll mark off since 2013 and the scanning of Senate ballot papers to facilitate the complex upper house count. The AEC will continue to leverage technology to support election planning, administration, delivery and assurance, and will only ever utilise technology in voting or counting processes in line with our legislation and in a manner that is understood and accepted by voters, candidates and campaigners.

Therefore, the AEC's position in relation to AI is that it may have a role in supporting internal administration and capability where its use is controlled, transparent, secure, and subject to human judgement and decision making. However, as technology evolves, the foundations of Australian federal elections remain unchanged: trusted electoral outcomes depend on transparent, human-led processes, with technology serving as a tool to support, not replace, those responsibilities. This reflects a deliberate approach: adopting AI only where it is right to do so, not simply because the technology is available.

The implementation and usage of AI tools is carefully governed in the AEC in accordance with WoAG requirements. Potential uses are assessed for their value, are monitored to ensure they maintain human-led oversight and decision-making as well as appropriate security and privacy controls, and are evaluated to understand efficacy.

Early, controlled use of AI in areas such as software development support, doctrine development, administration, and project management has shown promise, particularly where it enables staff to focus their efforts on critical thinking, judgement and decision making. These uses support the AEC's broader delivery and transformation work.

Risks to electoral integrity

The AEC acknowledges the potential benefits of AI to some aspects of electoral management and the information environment, but at this stage of AI's evolution, we have significant concerns about the potential

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negative impact it could have on trust in elections and democracy more broadly. Regulation may be able to play a role in mitigating that concern, however it would require careful consideration to not overstep the bounds of the implied freedom of political communication, nor unduly limit the benefits AI could present to participants in the electoral process. Therefore, any AI regulation would need to establish careful guardrails with sufficient flexibility within which the AEC could effectively operate. Globally, EMBs are grappling with this challenge and there are already a range of regulatory approaches adopted from which Australia could potentially learn.

Concerns outlined in the [AEC's 2024 submission to the Senate Select Committee on Adopting Artificial Intelligence](#) still stand, and given AI's rapid development, the risks have further increased.

- AI can act as an amplifier and accelerant to existing threats to electoral integrity, such as mis/disinformation, foreign interference, impersonation, inauthentic campaigning and the harassment of election officials.
- AI increases the realism of digital content and enables the rapid creation and distribution of information at unprecedented scale. As these technologies evolve, they make it more difficult for people to distinguish between authentic and manipulated content, increase confusion about authoritative sources of information, and create challenges for EMBs who must maintain trust, accuracy and transparency in communications. This is especially problematic given the immutable timeframes associated with elections; inauthentic content or deepfakes circulating during the voting period, for instance, may well compromise the actual or perceived integrity of an election.
- The contemporary information environment has created financial incentives to produce deliberately divisive online content to attract higher levels of engagement on social media platforms. Easy access to images and narratives that resonate with Australian audiences now exists for anyone - whether domestically or foreign based - seeking to potentially influence or interfere with elections, and AI enables convincing content to be generated at scale. In addition to the proliferation of inauthentic communication itself and the confusion and issues that causes, there is a risk that this activity might undermine the perceived integrity of Australian elections.
- Media reporting throughout 2026 has pointed to an increase in this behaviour targeting political figures in Australia.¹ While the *Commonwealth Electoral Act 1918* restricts foreign campaigners from incurring electoral expenditure or fundraising for the purpose of influencing the result of federal elections, these legislative provisions are very challenging to enforce on those in foreign countries. Moreover, with the rapid advancements in AI, this material designed to influence could effectively be produced at little or no cost, meaning there may be no electoral expenditure provisions to enforce.
- Voters are increasingly accessing electoral information through AI-enabled intermediaries rather than directly from authoritative sources. Search engines now routinely provide AI-generated summaries, chatbots increasingly function as information intermediaries, and social media platforms are introducing AI-generated responses within their products. According to a report from the 2025 Netherlands federal election chatbots "do not function neutrally compared to traditional voting aids".² Emerging research is also showing that voters may change their vote preference based on what AI chatbots tell them, and given the generation now of personalised content, some 'trained' AI tools recommend to users how to vote.³ While many AI chatbots will attempt to counter incorrect information, rather than display it, they can only operate as accurately as the online information that

¹ <https://www.abc.net.au/news/2026-03-11/foreign-fake-news-pauline-hanson-one-nation/106436702>

² <https://www.autoriteitpersoonsgegevens.nl/en/current/ap-warns-chatbots-give-biased-voting-advice>

³ <https://www.nature.com/articles/s41586-025-09771-9>

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feeds them, and personalisation makes it extremely difficult to be assured of the content being provided to users.

- Frontier AI and the expected emergence of Artificial General Intelligence (AGI) are expected to increase the scale, speed and sophistication of cyber threats, placing greater demand on cyber assurance, monitoring, vulnerability management and remediation activities.

AEC response to risks to electoral integrity

As part of updating the *Commonwealth Electoral (Authorisation of Voter Communication) Determination 2021* that regulates the authorisation requirements for election communication, the AEC is considering a requirement for deepfakes in electoral communication to be labelled. Consultation on this proposal with key stakeholders is currently underway. The AEC does not have any legal authority to regulate electoral related AI communication outside of this delegated power to issue an Authorisation Determination. Any further regulatory role and power is a matter for Parliament.

Following a submission and evidence by the AEC regarding challenges with the current legislation regarding Authorisations, the recent interim report from the Joint Standing Committee on Electoral Matters recommended legislative amendments to update and modernise those electoral authorisation laws.⁴ This report is now with government to consider.

In the meantime, the AEC is focussed on consolidating our existing education and engagement efforts and further building electoral literacy of Australians through the provision of resources to help voters, campaigners and candidates navigate the challenging information environment during elections. Additionally, through the Website Modernisation Project, the AEC is redesigning our website and its underlying technology platform to ensure electoral information is accurate, authoritative, accessible and structured for discovery by search engines, AI assistants and generative AI platforms. By improving content governance, information architecture, metadata, accessibility and machine-readability, the AEC aims to increase the visibility of trusted electoral information across emerging digital channels and AI-enabled ecosystems.

The AEC continues to work with relevant agencies across Federal Government as part of the Electoral Integrity Assurance Taskforce (EIAT) to monitor and respond to threats to electoral integrity within existing agency remits and legislative frameworks. The AEC also works proactively with social media companies – and ahead of the next federal election this will include prominent AI companies – to seek their commitment and support to mitigate the aforementioned risks.

Summary

While the AEC is carefully adopting AI for some targeted processes and is realising benefits accordingly, our primary focus is ensuring that public confidence, electoral integrity and trust in democratic processes are maintained as the technology continues to evolve. AI is increasing the speed, scale and complexity of threats to electoral integrity and, if the legal and regulatory regime does not keep pace, may put at risk Australians' trust in democracy and elections.

The AEC welcomes the opportunity for further discussion on the matters raised in the submission.

⁴https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Electoral_Matters/2025federalection/Interim_Report