Law Council
OF AUSTRALIA

Office of the President

29 September 2025

The Hon Justice Nye Perram
Federal Court of Australia
Law Courts Building
Queens Square
SYDNEY NSW 2000

By email: michael.serban@fedcourt.gov.au

Dear Justice Perram

REVIEW OF THE FEDERAL COURT OF AUSTRALIA'S DIGITAL PRACTICES AND PROCEDURES

1. The Law Council appreciates the opportunity to provide input to the Federal Court of Australia on the use of digital technology, including feedback on the *Technology and the Court Practice Note* (**GPN-TECH**).

2. The Law Council acknowledges the input of the Legal Technology Committee (Federal Dispute Resolution Section), the Intellectual Property Committee (Business Law Section), the Law Society of the Australian Capital Territory, the Law Society of New South Wales, the Law Institute of Victoria, the Law Society of South Australia, and the Queensland Law Society to this submission.

3. In addition, the Law Council draws on its recent submission *Use of Artificial Intelligence and the Courts* (June 2025)[1] and its *Principles for Determining the Appropriateness of Online Hearings* (November 2022) (**Principles**),[2] and refers to those documents where relevant.

Virtual hearings

4. The Law Council supports a balanced approach to the use of online hearings, as set out in the Principles. Briefly stated, the aim is to ensure key principles of fair and open justice are maintained while utilising technology to improve efficiency where appropriate—such as in non-contentious preliminary hearings.

5. The profession strongly supports the continuation of virtual hearings, which have tangible benefits for access to justice. However, practitioners remain of the view that not all matters should be determined virtually.

6. The Law Council received feedback that practitioners across the nation appreciate the cost and time benefits associated with virtual hearings: particularly those practising in rural, regional or remote areas or across jurisdictions, individuals with caregiving

[1] Law Council of Australia, *Use of AI in the Courts* (Submission, 16 June 2025).
[2] Law Council of Australia, *Principles for Determining the Appropriateness of Online Hearings* (November 2022).

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responsibilities, and those with mobility or health challenges that make physical attendance difficult or impractical.

7. On the other hand, the Law Council has received consistent feedback that essential curial tasks—such as the assessment of witness credibility in contested cases—predominantly require in-person hearings. There is concern that the probative value of evidence may be diminished in virtual settings, especially where cross-examination is central to the resolution of factual disputes. Attending court in person can also sharpen a client's focus, reinforce the seriousness of the process, and underscore the ethical and legal obligations involved.

8. It is important that the technology utilised by the Courts is of a level of quality and reliability that all participants can contribute to the hearing effectively. In addition, technical issues—such as unstable internet connections, audio-visual delays, or platform incompatibility—can disrupt the flow of hearings and affect the quality of participation. The likelihood of these issues arising—and any adjustments that might be required—should be considered by the Court in determining the appropriateness of a virtual hearing.

9. In some instances, hearings requiring interpreter services can also be more difficult online than in person. It might be useful to consider further guidance to assist the Court, parties, interpreters and witnesses to prepare for, and participate in, virtual hearings.

10. The Law Council recommends that parties be invited to assist the Court early in the case management process to identify matters that may be suitable for virtual hearings. This proactive approach would support efficient scheduling and ensure that digital modalities are used appropriately, based on the nature and complexity of the matter.

<u>GPN-TECH references to virtual hearings</u>

11. The Law Council's specific suggestions made about GPN-TECH as it refers to virtual hearings include:

    (a) the list of circumstances in which the 'virtual courtroom' may be used should be broadened to reflect the contemporary usage and prevalence of virtual hearings;

    (b) the rules to be observed in virtual hearings should be made clear;

    (c) if there are key software and related services (such as hosting platforms for eCourt Books etc), GPN-TECH should provide a list of such requirements in a non-prescriptive format, to enable any participant engaging with the court to be clear on what is required of them.

12. We note that the Legal Technology Committee of the Law Council's Federal Dispute Resolution Section wrote to Justice Downes in March 2025 with further specific proposals for amending GPN-TECH. The relevant letter is not a public document, but its most pertinent contents are reproduced here for reference.

13. In relation to virtual hearings, the Legal Technology Committee noted that processes that used to be described as 'eTrials', 'eCourt Books' and 'eLodgment' have become ubiquitous, and might be now more accurately described as simply trials, court books

and lodgment/filing. It suggested that the wording of GPN-TECH should be updated to reflect the contemporary technological environment.[3]

14. The Legal Technology Committee also addressed, in some detail, means by which GPN-TECH might respond to the current drive to use artificial intelligence tools in relation to court proceedings. These aspects are discussed below.[4]

Livestreaming

15. The Law Council is of the view that, as with virtual hearings, livestreaming brings with it several advantages, including promoting transparency, building public confidence, and facilitating scrutiny.

16. Chief Justice Mortimer, in an October 2024 speech *Reflections on the Concept of "Open Justice"*, identified the important role that livestreaming can have in facilitating engagement with court processes for those who might otherwise be prevented as a result of geographic limitations:

> *This is a national Court and we must take care to conduct our work in a way which appropriately reflects this feature and the physical geography of our country …*
>
> *Livestreaming is often used in class action proceedings, including at case management level, to enable access by all group members to what is occurring in the proceeding. Native title case management is another area where live streaming or Microsoft Teams technology can be used to ensure that First Nations communities, whose native title claims are being dealt with by the Court, can stay in touch with the proceedings, no matter where they are. This technology, and improving the availability of internet across Australia, should not be understated as a means of keeping remote and often very disadvantaged communities in closer touch with a part of the justice system that profoundly affects their culture and traditions, and which can be transformational for communities who secure recognition of native title.*[5]

17. Livestreaming can also serve an important educational function, providing law students, junior practitioners and other interested observers access that might not otherwise be available, and which is invaluable for advocacy training purposes.

18. However, the Law Council also recognises that there are a number of potential disadvantages to livestreaming, as identified by Chief Justice Mortimer in a February 2025 speech on the topic *Livestreaming: Peaks and Pitfalls*.[6] Her Honour considered these risks under three categories: issues for participants; issues for the community (including the media); and issues for the Court.[7]

19. Among the most concerning issues are privacy and personal safety risks for participants.[8] The prospect of being viewed by the public at large—or worse, the potential for online abuse or other threats—may also affect the way participants

[3] The letter made specific suggestions for amendments to GPN-TECH in an attachment.
[4] See Use of Artificial Intelligence (AI) in litigation.
[5] Chief Justice Debra Mortimer, 'Reflections on the Concept of "Open Justice"' (Speech, Seabrook Chambers Public Lecture, Melbourne Law School, 2 October 2024) [89]-[90].
[6] Chief Justice Debra Mortimer, 'Livestreaming: Peaks and Pitfalls' (Speech, The Hon Malcolm Blue Memorial Address, South Australian Bar Association Annual Conference, 22 February 2025).
[7] Ibid.
[8] Ibid [30]-[46].

(including witnesses, counsel and even judges) engage in proceedings.[9] This may, in turn, impact the fairness of the outcome and the safety and wellbeing of those involved.

20. There is also the risk of streaming being recorded and reproduced, despite the fact that this is prohibited and viewers are advised that doing so may be punishable as a contempt of court. Additionally, there is a risk of a recording being digitally manipulated (for example using deepfake technology) and reproduced with intent to damage those involved (including the Court).

21. The potential benefits and risks of livestreaming proceedings must be carefully weighed and guided by clear principles. With the above considerations in mind, GPN-TECH should be revised to set out specific circumstances in which a livestream of a Court hearing/event will take place to guide not only judicial officers, but also the expectations of practitioners, clients, self-represented litigants and the public.

Digital court books

22. Practitioners report that the adoption of digital court books has significantly improved the efficiency, accessibility, and quality of materials presented to the Court. Digital formats streamline the preparation and exchange of documents, reduce printing and courier costs, and allow for easier navigation during hearings. The ability to hyperlink between documents, annotate electronically, and update materials in real time has enhanced both practitioner workflow and judicial engagement with the material.

23. Digital court books also support the broader modernisation of court processes, aligning with the Court's commitment to sustainability and technological innovation. They are particularly beneficial in complex matters involving large volumes of evidence, where physical court books would be cumbersome and costly to produce.

24. However, practitioners note that there is variability in formatting requirements across registries and between judicial officers, which can lead to inefficiencies and confusion. Clearer guidance on preferred formats and submission protocols in the *eBooks Practice Note* (**GPN-eBOOKS**) would assist in this regard.[10]

25. Some practitioners have noted further that GPN-TECH is not entirely consistent with the *Content of appeal books and preparation for hearing (APP 2).* These documents should be harmonised with one another, as well as with GPN-eBOOKS.

<u>Recommendations in relation to GPN-eBOOKS</u>

26. GPN-eBOOKS caters for two formats of eBooks as specified in 4.3:

- Format 1: 'Separate PDF or other index with cross-document relative hyperlinks to attachments'.[11]
- Format 2: 'One bookmarked and internally relative hyperlinked PDF document'.

[9] Ibid [36]-[46]. See also Dr Matthew Collins, 'Zeitgeist Litigation' (Keynote Address, Australian Lawyers Alliance National Conference, 16–18 October 2024).
[10] Federal Court of Australia, *eBooks Practice Note* (August 2022).
[11] Note: 1(c) of the *Technology Resources: GPN-eBOOKS* clarifies that for Format 1, 'File attachment' means an attachment of the PDF index, as opposed to files that can be opened from a link.

27. Both formats can be unwieldy to administer, particularly if there are numerous rounds of revision as the parties confer upon the composition of documents within the Court Book. The Court might wish to consider two changes to Format 1:

- removing attachments, and instead having each PDF as a standalone document that is referenced by a relative path hyperlink; and
- at item 4.3(b)(1)(vi) relating to eBooks of authorities—consider stipulating that these files be named by the tab number (for example, '02.pdf') rather than tab number followed by a sufficient description of the authority ('02. *Décor v Dart* [1991] FCA 844.pdf').

Practitioners find that hyperlinks can at times fail depending upon the length of the filename, as well as some limitations of the Microsoft Windows file system relating to characters in filenames.

28. On occasion, practitioners report that they have been ordered by the Court to provide eBooks on short notice and, in some instances, just before trial. Preparation of eBooks, including Optical Character Recognition as required, can be extremely time and cost intensive. The prescription of an appropriate notice period for the preparation of eBooks (in GPN-eBOOKS or elsewhere) would be of great assistance to practitioners.

29. Regarding the reference to the Standard Document Management Protocol in GPN-TECH, the Court's website provides two protocols: the Advanced Document Management Protocol and the Default Document Management Protocol. The Court's document management protocols have been enormously influential since their introduction prior to 2009, but have not been updated significantly in recent years. Consequently, they do not reflect developments in the internet, digital documents or methods of transferring electronic data. A revision of the Court's document management protocols is urgently required to ensure that the material put before the Court is presented efficiently, effectively and without the Court or the parties incurring unnecessary costs and time.

Concurrent expert evidence conducted by virtual hearings

30. The Law Council received little input on concurrent expert evidence conducted by virtual hearings, but one of the Law Council's constituent bodies reported that it has worked well to date.

Use of Artificial Intelligence (AI) in litigation

31. The Law Council responded to a specific consultation on the use of AI in the Court in June 2025.[12] The relevant submission addressed both the need for appropriate regulation (which could take various forms)[13] and the desirability of jurisdictional uniformity.[14]

32. In light of public challenges being faced by the profession and the courts regarding the use of generative AI (**GenAI**) in particular,[15] the Law Council encourages the Court to continue in its leading role in the adoption of new technology by taking opportunities to

[12] Law Council of Australia, *Artificial Intelligence use in the Federal Court of Australia* (Submission, 16 June 2025).
[13] Ibid [8] and [85]-[153].
[14] Ibid [4] and [90]-[84].
[15] See eg Swan, 'From hallucinations to High Court: Can AI administer justice?' *Sydney Morning Herald,* 16 September 2025.

educate practitioners on their ethical responsibilities (and self-represented litigants of their obligations) when using such tools.[16] Of course, broader responsibilities are held by regulators of the legal profession to ensure that practitioners are well-equipped to understand these responsibilities. Our June 2025 submission about Artificial Intelligence use in the Federal Court of Australia highlighted a number of recent steps adopted in this context.[17]

33. It could be beneficial to provide practitioners with more explicit, additional direction—for example by issuing a practice directive or an explanatory memorandum—as this might assist those who are less tech-savvy in understanding and complying with relevant obligations or standards more effectively. However, practitioners request that such a document, if adopted, not be overly prescriptive—rather it should focus on the principles to which court users should adhere when utilising AI.

34. The Law Council recommends ongoing consultation with the profession on this topic, as the relevant technologies are evolving rapidly, and any regulatory responses should be flexible enough to remain fit for purpose and reflect the realities of modern legal practice.

35. Generally technology-assisted review (**TAR**) or machine learning AI is widely accepted in Australia as a tool to assist in managing large scale document review. TAR is typically utilised in an ad hoc manner in document reviews.

36. GenAI in document review has only recently been introduced to the Australian market. As stated in the Law Council's June 2025 submission to the Court on the use of AI,[18] GenAI does not require significant volumes of documents to be coded before the model is able to make accurate predictions, instead GenAI is utilised via prompting.

37. Currently the GenAI components of eDiscovery systems are not suited for very large-scale document review, and instead the user is encouraged to present sample sets of documents for the system to analyse. Typically, the system has several different areas where the user must enter factual background information, followed by descriptive text that describes relevance.

38. Behind the scenes, the system would have hidden system prompts in place that would take steps to minimise hallucinations, as well as merging the factual background information and the descriptive text. The system conducts analysis against the sample set of documents and provides a relevance ranking.

39. Of the major eDiscovery systems used in Australia, most have either introduced GenAI functionality during 2025, or will be releasing GenAI functionality in the coming months. Due to the significant computational requirements for GenAI, this functionality is typically being released in the cloud or Software as a Service (**SaaS**) versions, and it is as yet unclear whether GenAI functionality will be incorporated into on-premise instances of these eDiscovery systems.

40. GenAI functionality in eDiscovery systems is being used in conjunction with human review and TAR where GenAI is used at the commencement of, or throughout the document review process.

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[16] Relevant resources are continually being made available. See, eg, Law institute of Victoria, *Ethical and Responsible Use of Artificial Intelligence* (Web page, Ethics Guidelines); also Queensland Courts, *Using Generative AI* (Webpage, guidance for judicial officers and non-lawyers).
[17] Law Council of Australia, *Artificial Intelligence use in the Federal Court of Australia* (Submission, 16 June 2025), [56]-[73].
[18] Law Council, *Artificial Intelligence use in the Federal Court of Australia*, [39].

41. One key difference between GenAI and earlier systems is that it is not limited to predicting relevance, but is also capable of:

    (a) summarising documents;

    (b) classifying by issue code or topic;

    (c) identifying key documents; and

    (d) generating chronologies.

42. GenAI shares some of the weaknesses of predictive coding, such as being mainly suited to text-based documents, and not suited at all to documents with little or no text such as spreadsheets, scanned PDFs, encrypted or corrupted files or images.

43. GenAI also introduces other challenges such as:

    (a) typically utilising an externally-hosted large language model (**LLM**);

    (b) additional usage costs;

    (c) hallucinations and uncertain consistency/repeatability of results;

    (d) computational processing time needed to conduct analysis, and

    (e) the rapid pace of change as new models are released and existing models are deprecated / made obsolete and removed from the market.

44. The Law Council considers that the benefits of utilising new technologies such as GenAI outweigh the risks. However, we also feel that there needs to be a level of regulation put in place, particularly regarding confidentiality, hallucinations and repeatability.

45. With any technology, algorithmic transparency is important in ensuring the integrity of the process.[19] The Federal Court has recognised the need for transparency in the TAR process, as shown by the *Money Max v QBE case*.[20] As new technology and algorithms are being developed, guidance for developing metrics and methods to validate the algorithms would be beneficial.[21]

46. The Court may wish to consider whether traditional obligations to produce every single relevant document could restrict adoption of time- and cost-saving AI tools. We note in this context that the TAR order made by Murphy J by consent in *Holly Southernwood v Brambles Limited* (VID972/2018)[22] meant the respondent was only obliged to produce 75% of the relevant documents. There were significant savings involved. However, these types of TAR orders are very technical, requiring practitioners to educate

[19] See 'Managing the Data – Technology Assisted Review' in Michael Legg, *Resolving Civil Disputes* (LexisNexis, 2nd ed 2024) Ch 20; UK Government, *Algorithmic Transparency Recording Standard Hub* (Web resource).
[20] Order of Justice Murphy in *Money Max Int Pty Ltd v QBE Insurance Group Ltd* (Federal Court of Australia, VID513/2015, 07 November 2016).
[21] A detailed discussion of the risks of over-reliance on 'black box' AI algorithms and consequences of failing to validate their operations can be found in Rowe and Prior, 'Procuring Algorithmic Transparency' (2022) 74(2) *Alabama Law Review* 303.
[22] Order of Justice Murphy in *Holly Southernwood & Anor v Brambles Limited* (Federal Court of Australia, VID972/2018, 11 October 2019).

themselves in the nuances and implications. Appropriate guidance and/or regulation would assist in developing a common understanding of such orders.

GPN-TECH and AI

47. The Law Council notes that a separate consultation process is underway to consider the development of either Guidelines or a Practice Note regarding the use of GenAI by practitioners and Court users. As expressed in our June 2025 submission to the Court's AI Project Group, the Law Council supports, in principle, the development of a Practice Note on the use of GenAI in the Court.[23] In that context, we recommended that consideration be given to developing separate, tailored guidance for legal practitioners, experts, self-represented litigants, the public, and the judiciary.[24]

48. The Law Council notes the introduction of guidance on AI usage by the Supreme Court of Victoria,[25] the Supreme Court of New South Wales (as amended on 28 January 2025, which commenced on 3 February 2025),[26] the Supreme Court of Queensland,[27] and the UK Courts and Tribunals.[28]

49. The Court may also wish to integrate into GPN-TECH simple, plain English guidance on the use of AI tools and platforms by, and in, the Court.

50. In recent months there have been a number of examples of practitioners and self-represented litigants using publicly and generally available generative AI tools to produce content which, while appearing credible, has included 'hallucinations' or errors, including the citation of non-existent cases. At the same time, many established software providers, legal technology companies and legal research resources have introduced AI-assisted functions or platforms. These include everything from tools that purport to provide authoritative, referenced text which might be used in submissions to the AI-assisted predictive text function included by default in the latest versions of Microsoft Word.

51. The Law Council notes the joint publication of the *Statement on the Use of Artificial Intelligence in Australian Legal Practice* by the legal industry regulators in Victoria, NSW and Western Australia.[29] This statement emphasises that legal practitioners are bound by their existing legal duties and obligations when they use AI tools and platforms. Similarly, a person swearing an affidavit, or a self-represented litigant attesting to a claim or response having a proper basis, are both bound by their existing duties to the Court, whether they draft those documents unaided or if they use the assistance of an AI tool or platform or another person.

52. Existing duties and obligations must remain the starting point when a person certifies or attests to the authenticity, accuracy or truth of the contents of documents.

53. Strict regulation or even prohibition on the use of AI may be appropriate with respect to high-risk or sensitive documents, such as those subject to an implied undertaking.

[23] Law Council of Australia, *Artificial Intelligence use in the Federal Court of Australia* (Submission, 16 June 2025).
[24] Ibid.
[25] *Guidelines for Litigants: Responsible Use of Artificial Intelligence in Litigation* (May 2024). See also the similar guidelines published by the County Court of Victoria in July 2024.
[26] *Practice Note SC Gen 23* – *Use of Generative Artificial Intelligence (Gen AI) and guidelines for judges*.
[27] *Practice Direction Number 5 of 2025: Accuracy of References in Submissions* (September 2025)
[28] See, eg *Artificial Intelligence (AI) – Judicial Guidance*, published 12 December 2023.
[29] Legal Services Board and Commissioner (Victoria), *Statement on the use of AI in Australian Legal Practice* (March 2025).

54. However, any regulation of the use of AI by participants in court systems must balance recognition of the core function of relevant duties and obligations with both the rapid pace of change in AI tools and platforms (and other future forms of emerging technology) and the potential of AI tools and platforms to reduce costs and increase efficiency. For example, it is possible that parties may be able to use AI tools to assist in preparing summaries of complex or voluminous documents or chronologies, lists of persons or other documents that can assist the Court. Given the complexity of these issues and the rapid rate of change in relation to legal technology, the Law Council suggests that any guidance added to GPN-TECH is principle-based and written simply from a court user's perspective.[30]

55. GPN-TECH and accompanying materials presently contain few references to AI. There is one reference to predictive coding in the last bullet point of paragraph 3.8:

> *The Court's SDMP sets out the fundamental considerations for parties to consider and agree, for efficient document management in electronic discovery including: determining the document descriptions for any List of Documents; agreeing on the document structure, format and page numbers; and determining the most appropriate electronic exchange media. The SDMP may also set out the parties agreement in relation to:*
>
> - *what data security will be put in place;*
> - *managing errors in exchanged documents;*
> - *redacting documents and managing privileged or confidential documents;*
> - *reviewing and processing documents, including what methods may be used, such as keyword searches, predictive code, de-duplication of documents and email threading.*

56. There is a further mention of predictive coding in the Court's checklist for *Litigation using Electronic Discovery:*

> ***identification:*** *what electronic search strategies can be used to conduct a reasonable search to locate discoverable documents—such as using appropriate forms of technology assisted review (or TAR) such as:*
>
> - *predictive coding*
> - *email threading technology*
> - *keyword / concept searches*
> - *de-duplication*.[31]

57. There are no other references to AI in GPN-TECH or the accompanying materials. We anticipate that, following this consultation, GPN-TECH may be revised (subject to, or alongside, other steps adopted following the current consultation on artificial intelligence use in the Federal Court), and we hope that the preceding discussion will be of use in the revision process.

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[30] Eg a definition of AI might follow the example in the UK AI Guidance: 'Computer systems able to perform tasks normally requiring human intelligence' or the Victorian Guidelines, p 5: 'A term describing a range of technologies and techniques used to computationally generate outputs that typically require human intelligence to produce' rather than the more detailed and technical approach reflected in the OECD definition of an 'AI system' presented in *Recommendation of the Council on Artificial Intelligence* (Report No OECD/LEGAL/0449, 2024).

[31] Federal Court, *Litigation using Electronic Discovery* (webpage providing checklists).

Additional observations

58. Practitioners suggest that GPN-TECH should provide guidance on minimum standards for data governance, security, and retention obligations (including as these obligations relate to AI use, which presents particular challenges in this regard).[32] Such guidance would ensure a robust framework that all parties can rely upon to guide their technological usage within the Court.

59. Although it is a leader in embracing technology generally, the Federal Court does not currently accommodate the electronic making, signing and witnessing of affidavits. Other jurisdictions have been facilitating electronic processes for these tasks for many years, with considerable benefits in terms of efficiency and cost-effectiveness.[33] We would welcome consideration of a similar approach in the Federal Court.

60. In addition, 'wet ink' signed and scanned affidavits can produce large file sizes. Practitioners note that GPN-eBOOKS provides specific guidance for large files (eg dividing into parts and linking between them) that could also be applied to large affidavits and expert reports.

61. The Law Council notes further that some amendments to GPN-TECH made as a result of recommendations in this submission might also require consequent amendments to the Technology Resources.[34] These may include the:

- *Guide to preparing documents for the Court* (2014 version);
- *National Practitioners/Litigants Guide to Online Hearings and Microsoft Teams* (updated 26 May 2020);
- *Technology Glossary*; and
- *Checklists for Litigation using Electronic Discovery*.

62. The Law Council remains highly conscious that, despite all of the good reasons discussed above for digital alternatives to in-person hearings and paper-based processes, a significant proportion of the Australian community remains digitally excluded; this should be borne in mind in developing the court's practices and policies.[35] There may also be relevant limitations on the technology available to sole practitioners and small legal practices.

63. The profession once again thanks the Court for the opportunity to comment on these issues, and appreciates the Court's responsiveness to the rapidly-evolving technological environment for practitioners and litigants.

[32] See eg Law Council, *Artificial Intelligence use in the Federal Court of Australia*, [47] and [145]-[152].
[33] See eg *Oaths Act* 1867 (Qld), s 16C.
[34] Federal Court of Australia, *Technology Resources: GPN-TECH*.
[35] See Telstra/RMIT/Swinburne, *Measuring Australia's Digital Divide: Australian Digital Inclusion Index 2023*.

Contact

64. To discuss this submission further, in the first instance please contact Dr Adam Fletcher, Senior Policy Lawyer, [redacted].

Yours sincerely



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President