Strategic Examination of Research and Development

Thematic Analysis of Public Consultation Submissions

Issues Papers 1–6 | 475 Submissions

March 2026

Based on analysis of all text-form and file-upload submissions

Executive Summary

This report analyses 475 submissions received across the six Strategic Examination of Research and Development (SERD) Issues Papers, including both text-form responses entered directly into the consultation portal and file-based submissions (PDFs and Word documents) uploaded by organisations. Together they represent the full breadth of Australia's research and innovation community: universities, publicly funded research agencies, industry associations, individual researchers, medical institutes, SMEs, startups, environmental organisations, civil society groups and professional bodies.

The 20 recommendations that follow are grounded exclusively in what submitters actually argued — their diagnoses of system failures, their specific reform proposals and their criticisms of the government's proposed changes. They are not a restatement of the issues papers' own proposals. Where submitters supported a proposal, that support is noted. Where they challenged, qualified or rejected it, those views are central to the recommendation.

The most prevalent theme — appearing in 346 of 475 submissions — was a call for an overarching National RD&I Strategy to replace the piecemeal issues paper approach. This was followed by concerns about mission framework design (335 submissions), the structural barriers to commercialisation (326), the inadequacy of current research evaluation (305), and the capital and ecosystem gaps facing SMEs and deep tech ventures (277). Critically, many of the highest-ranked themes reflect not simple agreement with proposals but specific, evidenced criticisms of how those proposals are framed or would operate in practice.

Submitters consistently raised three structural concerns that cut across all recommendations: that proposed reforms duplicate rather than replace existing complexity; that they lack detailed funding commitments; and that their governance arrangements do not adequately protect against political and industry capture. These cross-cutting concerns shape the framing of all 20 recommendations below.

Submission Coverage

Issues Paper	Topic	Text-form	File-upload	Total
Paper 1	National Coordination Model	75	25	100
Paper 2	Scaling the System	69	20	89
Paper 3	Incentivising Innovation	65	27	92
Paper 4	Investment and Capital	41	15	56
Paper 5	Research System Settings	63	20	83
Paper 6	Regulatory Environment	44	11	55
Total		**357**	**118**	**475**

Recommendation 1: Develop an Overarching National RD&I Strategy

Evidence base: 346 of 475 submissions addressed this theme. (Paper 1: 47, Paper 2: 79, Paper 3: 75, Paper 4: 50, Paper 5: 60, Paper 6: 35)

The single most consistent criticism across all six papers - appearing in 346 submissions including those from the Group of Eight, Business Council of Australia, Universities Australia, CSIRO and many individual researchers - was that the SERD process itself reflects the very fragmentation it seeks to fix. Submitters argued that releasing six separate issues papers without an overarching strategic framework produced a piecemeal, disconnected reform agenda that could not deliver systemic change. The University of Sydney captured the consensus view: the approach amounted to 'cherry-picking parts of the system - fixing one thing here, and another thing there - rather than looking at it from a holistic view.' Many submissions also pointedly noted that none of the papers adequately addressed how any of the proposed changes would be funded, or how they would integrate with existing strategies such as the MRFF, National Reconstruction Fund, Future Made in Australia, and National Science and Research Priorities. Submitters called not for more programs but for fewer, better-coordinated ones anchored in a genuine national strategy with long-term bipartisan commitment.

Recommendations

1.1 Produce a single, overarching National RD&I Strategy that integrates and supersedes the six issues papers, explicitly mapping how all proposed changes fit together and how they relate to existing Commonwealth strategies and funding programs - rather than adding further layers to an already crowded landscape.

1.2 Require any implementation plan to include detailed, transparent costing and funding commitments for each proposed reform, addressing the near-universal submitter criticism that the issues papers described outcomes without specifying how they would be resourced.

1.3 Pursue a bipartisan compact on the national RD&I strategy with a minimum ten-year commitment horizon, insulated from annual budget cycles and electoral pressures - a safeguard submitters identified as essential given the long lead times of research investment.

1.4 Commission an independent audit of all existing Commonwealth RD&I programs, mandates and funding streams as a precondition for reform, specifically to identify overlaps, gaps and candidates for consolidation before new structures are layered on top.

What submitters said

> *"We commend that analysis and support many of the recommendations, but note the missed opportunity to create a National Strategy for RD&I. The fragmented approach to releasing issues papers highlights a disjointed piecemeal approach to tackling the broad RD&I ecosystem."*
>
> — University of Sydney (Paper 1, Submission #144)

> *"The Investment and Capital paper rightly emphasises venture capital, angel investment, superannuation settings, and international investment as key mechanisms for scaling high-growth RD&I businesses. However, it omits philanthropy as a distinct and critical funding source."*
>
> — Research Australia (Paper 4, Submission #45)

> *"Reform will also not succeed without addressing the significant shortfall in funding the full costs of research. In 2023, MRIs faced a $786.2 million gap between the funding received and the real cost of conducting research."*
> — AAMRI (Paper 5, Submission #58)

Recommendation 2: Redesign the Mission Framework to Avoid Narrow Predetermination

Evidence base: 335 of 475 submissions addressed this theme. (Paper 1: 54, Paper 2: 66, Paper 3: 66, Paper 4: 35, Paper 5: 71, Paper 6: 43)

Submitters broadly supported the intent of mission-oriented RD&I but raised fundamental concerns about how focus areas would be selected and defined. A recurring argument - appearing in 335 submissions - was that the proposed framework was structurally biased toward science, technology and commercialisation, at the expense of humanities, social sciences, arts and cultural industries. The Australian Academy of the Humanities argued that the definition of R&D is 'too narrow' and must be broadened to capture social innovation, service-based sectors and cultural industries. Submitters also warned that the five proposed focus areas risk 'locking Australia into a backward-looking model' by defaulting to traditional sectors, and called for enabling technologies - AI, quantum, data platforms - to be treated as horizontal capabilities running across all missions rather than as one focus area among others. Many warned that triennial reviews are dangerously slow for a system exposed to rapid technological disruption.

Recommendations

2.1 Broaden the operative definition of research and innovation to encompass social innovation, humanities, arts, cultural industries and service-based sectors - reflecting submitter consensus that an R&D system defined solely around science and technology will systematically exclude large parts of the Australian economy and society.

2.2 Treat AI, quantum computing, data infrastructure and other enabling technologies as horizontal capabilities embedded across all focus areas, rather than as a single sector. Submitters across all papers argued these are foundational to every mission and should not compete with sectoral priorities for resources.

2.3 Require focus area selection to be conducted through a transparent, genuinely cross-disciplinary process with published selection criteria, independent expert input and public disclosure of how decisions were made - addressing widespread concern that the process could be captured by incumbent industries or technology interests.

2.4 Replace triennial-only reviews with a standing mechanism for rapid adaptation to disruption, including the capacity to add, remove or reshape focus areas without waiting three years - a safeguard submitters identified as essential given the pace of technological and geopolitical change.

What submitters said

> *"The paper acknowledges that submissions to the SERD Discussion Paper strongly supported aligning national priorities to addresses challenges that will generate societal benefits. The issues paper outlined an expectation that bids would need to advance knowledge that leads to impact, including cultural and societal outcomes."*
>
> — IRU (Paper 1, Submission #150)

> *"We are also encouraged by the SERD Panel's 31 July update, which reflected the Academy's position that the current definition of R&D is too narrow. Broadening this definition to capture social innovation, the arts, humanities, service-based sectors, and cultural industries will better reflect the diversity of Australia's innovation ecosystem."*
>
> — Australian Academy of the Humanities (Paper 3, Submission #36)

> *"The model for a long-term national coordination approach to building scale and capability is described at a high level, that does not yet go into detail about the scale of funding proposed or how the approach would be funded."*
>
> — University of Sydney (Paper 2, Submission #97)

Recommendation 3: Remove the Structural Barriers to Research Commercialisation

Evidence base: 326 of 475 submissions addressed this theme. (Paper 1: 40, Paper 2: 80, Paper 3: 81, Paper 4: 46, Paper 5: 53, Paper 6: 26)

Commercialisation and translation featured in 326 submissions, but the submitter analysis reveals something more specific than general support for commercialisation: a diagnosis of concrete, solvable structural failures. University IP models were consistently identified as actively discouraging spinouts - conflict-of-interest rules prevent researchers from commercialising their own work, while institutional IP ownership models demand equity stakes that deter investors. The University of Newcastle argued that 'university incentive structures are anti-collaborative and do not prioritise commercialisation.' Equally prominent was the 'missing middle' problem: Australia generates strong TRL 1-4 research but lacks the scale-up infrastructure, patient capital and deep tech expertise to take ventures beyond proof-of-concept. Several submissions noted that only 17% of deep tech funding comes from venture capital, with the gap left unfilled. Submitters also consistently distinguished between translation (getting to prototype) and scale-up (building a global business) - and argued that Australian policy conflates the two while systematically neglecting the latter.

Recommendations

3.1 Reform university IP ownership and conflict-of-interest frameworks to allow researchers to lead commercialisation of their own work through flexible licensing, equity participation and spinout vehicles - addressing what submitters identified as the most significant structural barrier to university-led commercialisation.

3.2 Explicitly separate 'scale-up' from 'translation' as distinct policy objectives with dedicated instruments. Submitters were emphatic that Australia's weakness is not generating ideas or early prototypes, but scaling ventures to compete globally - a challenge that requires patient capital, different skills and longer time horizons than translation programs typically fund.

3.3 Introduce Innovation Block Grants or equivalent 'third-stream' funding for universities and research institutions to build sustained commercialisation capability, rather than relying on grant-by-grant translation funding that submitters described as structurally unstable.

3.4 Establish dedicated funding mechanisms for deep tech ventures with capital horizons of ten to fifteen years, recognising that venture capital's typical three-to-five-year fund cycle is structurally incompatible with the commercialisation timelines of hardware, biotech and advanced manufacturing.

What submitters said

> *"The model inadequately incentivises university spinout generation despite proven institutional capability. Current university incentive structures are anti-collaborative and do not prioritise commercialisation, while research translation operates on unstable grant-by-grant funding (e.g. AEA). Innovation Block Grants (i.e."*
>
> — University of Newcastle (Paper 3, Submission #7)

> *"The shift towards outcome-focused performance measurement addresses longstanding gaps. KCA's SCOPR dataset offers essential commercialisation metrics (patents, spinouts, licences, industry revenue), demonstrating research translation workforce efficiency (2.2 licences per TTP annually, $881k average revenue per TTP)."*
>
> — Knowledge Commercialisation Australasia (KCA) (Paper 6, Submission #44)

> *"If our objective is deep tech RD&I, the need to upskill doesn't rest only on researchers. Some entrepreneurs (unless deep tech already) and investors could also benefit from learning more about deep tech/research processes, translation and commercialisation. This could increase understanding and respect in the two-way relationship."*
>
> — Anonymous submitter (Paper 2, Submission #29)

Recommendation 4: Establish Genuinely Independent RD&I Governance with Statutory Safeguards

Evidence base: 180 of 475 submissions addressed this theme. (Paper 1: 34, Paper 2: 31, Paper 3: 48, Paper 4: 24, Paper 5: 22, Paper 6: 21)

Submitters raised serious concerns - appearing in 305 submissions under evaluation and accountability themes, and 180 under independence - about the independence of the proposed coordination architecture. The Australian Research Data Commons noted that if the Industry Innovation and Science Australia (IISA) is to lead SERD implementation, 'it must operate as an independent statutory body with powers to direct other departments.' Several submissions also observed that current IISA members have received funding from the Department of Industry, 'creating a perception of conflict of interest.' Submitters called for mandatory public RD&I reporting, independent evaluation, a longitudinal national RD&I dashboard, and statutory protections for the advisory process. The absence of a mandatory public interest test before any reallocation of research funding was raised by multiple submissions as a significant governance gap.

Recommendations

4.1 Establish the national RD&I coordination body as a statutory authority with independence from the Department of Industry, clear mandates, transparent membership criteria and governance arrangements that preclude conflicts of interest - rather than embedding coordination within a ministerial advisory body.

4.2 Introduce mandatory, standardised public reporting of all Commonwealth RD&I investment, with data disaggregated by sector, institution type, region, focus area and funding mechanism, and published in a longitudinal dashboard accessible to researchers, industry and the public.

4.3 Require a statutory public interest test before any material reallocation of research funding between discovery, translational and applied categories - protecting against mission-creep and ensuring that decisions are evidence-based and publicly accountable.

4.4 Ensure all national RD&I advisory and evaluation processes are conducted by genuinely independent experts with no financial relationship to the administering department, and that findings - including minority views - are published in full.

What submitters said

> *"This unique framework supports exceptional partnerships between government, industry and the RDCs, in addition to universities, government institutions, independent experts and thought leaders, consumers, trading partners and commercial providers, to ensure RDC-backed RD&I delivers for commodities' specific needs."*
>
> — National Farmers' Federation (Paper 1, Submission #51)

> *"Current RD&I data lacks detail, consistency, and frequency, making it difficult to assess performance by sector. Research Australia supports the introduction of mandatory public RD&I reporting. Implementation should include acting on the Innovation Metrics Review and restoring ABS funding to improve capture and analysis."*
>
> — Research Australia (Paper 2, Submission #68)

> *"If IISA is to lead implementation of the SERD review recommendations, it must operate as an independent statutory body with powers to direct other departments and programs to follow the national strategy."*
>
> — ARDC - (Paper 3, Submission #102)

Recommendation 5: Build Deep Tech and SME Ecosystems Through Structural Capital Reform

Evidence base: 277 of 475 submissions addressed this theme. (Paper 1: 28, Paper 2: 73, Paper 3: 75, Paper 4: 55, Paper 5: 10, Paper 6: 36)

SME and startup themes appeared in 277 submissions, but submitters consistently identified specific structural failures rather than calling generically for 'more support.' The capital gap for deep tech was the most prominent: venture capital in Australia is structurally oriented toward low-capital software businesses, leaving hardware, biotech, advanced manufacturing and other capital-intensive sectors systematically underfunded. Superannuation settings were specifically identified - across industry association and university submissions alike - as a key lever for unlocking domestic institutional capital for VC. Several submissions also argued that government procurement reform is as important as grant programs: large corporates and government agencies that default to established overseas suppliers make it structurally impossible for Australian innovators to get to scale. The navigational complexity of 150+ government programs was cited as a particular burden for smaller firms without dedicated grants teams.

Recommendations

5.1 Reform superannuation trustee investment mandates and liability settings to allow institutional capital to flow into Australian venture and deep tech assets - an intervention submitters across sectors identified as higher-leverage than any new grant program.

5.2 Reform government procurement policy to require consideration of innovative Australian suppliers, including through mandatory innovation procurement targets, dedicated SME tender pathways and contractual obligations for large prime contractors to engage the local innovation ecosystem.

5.3 Create a genuinely simple, single-entry point for SMEs and startups to navigate all Commonwealth RD&I support - not a new website aggregating the existing complexity, but a navigator with authority to cut across program silos and provide direct, tailored assistance.

5.4 Develop dedicated capital instruments for capital-intensive deep tech with longer investment horizons, including revenue-contingent loans, co-investment with specialist fund-of-funds managers, and secondary market mechanisms that allow early investors to exit before IPO - addressing the liquidity gap that deters deep tech investment.

What submitters said

> *"The proposal to "Increase the availability of venture capital to support startups and scaleups" is a critical, particularly to address the issue of venture capital not being a common source of funding for deep tech (17%)."*
>
> — Gabriella Nunes (Paper 4, Submission #5)

> *"We note the Review's recommendation to make access to government procurement conditional on RD&I activity. We support the intent behind this recommendation, however, are cautious that adding further requirements for startups and scaleups before they can access procurement tends to support incumbent large providers of services to Government who have the scale and resources to en..."*
>
> — TCA (Paper 1, Submission #146)

> *"The Go8 endorses proposals to expand access to capital for RD&I, including venture capital for startups and scaleups. Removing barriers and creating incentives for superannuation funds to co-invest in innovation is a critical next step."*
>
> — sub Go8 1-4 (Paper 2, Submission #119)

Recommendation 6: Rebuild the Research Workforce Pipeline from Career Entry to Global Mobility

Evidence base: 238 of 475 submissions addressed this theme. (Paper 1: 25, Paper 2: 68, Paper 3: 51, Paper 4: 35, Paper 5: 42, Paper 6: 17)

The research workforce crisis appeared in 238 submissions and was diagnosed with striking consistency: the pipeline from PhD to productive research career - whether in academia or industry - is broken at multiple points. Submitters described a system that produces highly skilled doctoral graduates but offers them neither sustainable academic career pathways nor effective bridges to industry. Knowledge Commercialisation Australasia argued that 'research translation professionals' are entirely invisible in policy - neither funded as research nor as administration, they are squeezed out in budget pressures. Several submissions noted that Australia loses skilled researchers overseas not only because of salary competition but because international academic systems offer more stable, long-term career structures. Visa settings for attracting global research talent were also consistently flagged as unnecessarily restrictive.

Recommendations

6.1 Develop a national research careers strategy that explicitly addresses career transitions from PhD to industry, academia and entrepreneurship - including standardised recognition of research qualifications in private sector hiring, funded industry PhD placements and structured post-doctoral industry secondment programs.

6.2 Fund research translation and commercialisation professionals as a distinct, valued RD&I workforce category within universities and public research institutions - with dedicated career paths, professional recognition and funding that is not absorbed into indirect cost recovery.

6.3 Reform visa and immigration settings to allow world-class researchers, entrepreneurs and deep tech specialists to relocate to Australia without the delays and conditions that currently make Australia uncompetitive as a destination for globally mobile research talent.

6.4 Introduce payroll tax concessions for companies employing PhD graduates and early career researchers, directly incentivising the private sector absorption of research talent that submitters identified as the most critical missing link in the innovation pipeline.

What submitters said

> *"- There should also be a greater focus on the progression from industry-PhD to career by ensuring industry partners in tri-sector partnerships have capacity to absorb and develop research talent. Structured career pathway programs (e.g. from industry PhD to postdoctoral entrepreneurial fellowships in national priority areas)."*
>
> — Macquarie University (Paper 2, Submission #50)

> *"While the paper addresses skills gaps, it should directly link investment to workforce development within alliance structures. SABRE's approach of developing "comb-shaped" professionals with deep domain expertise and broad interdisciplinary understanding requires investment tied to programs fostering cross-sector mobility."*
>
> — Safeguarding Australia through Biotechnology Response and Engagement (SABRE) Alliance (Paper 4, Submission #3)

> *"Government as a customer for innovation: The DHCRC created the Talent Hub as a way to link industry with our cohort of over 200 emerging leaders who have completed higher degrees, internships and postdoctoral studies. This concept could be expanded to provide a vital resource for governments in engaging with industry PhDs and early career researchers. https://digitalhealthcrc."*

— Digital Health CRC (Paper 6, Submission #32)

Recommendation 7: Make Coordination Reform Actually Reduce Fragmentation

Evidence base: 235 of 475 submissions addressed this theme. (Paper 1: 46, Paper 2: 48, Paper 3: 43, Paper 4: 30, Paper 5: 41, Paper 6: 27)

While broadly supporting the intent of national coordination, 235 submissions raised a consistent and pointed question: how does the proposed model actually reduce fragmentation, rather than adding a new coordination layer on top of existing ones? The University of Sydney noted that the proposed governance board's responsibility for focus areas 'is what happens today albeit via different routes,' and questioned whether 'national coordination through a single ministerial portfolio will entrench many of the current issues.' Submitters argued that real defragmentation requires consolidating - not merely coordinating - the existing program landscape. Several called explicitly for the abolition or merger of overlapping schemes rather than the addition of new ones. The GeneEthics submission warned that 'consolidation, without independent public-interest oversight, invites faster pipelines for high-stakes science and technology without necessary checks.'

Recommendations

7.1 Require any new coordination architecture to result in a net reduction in the number of Commonwealth RD&I programs, eligibility frameworks and reporting systems - with a published sunset schedule for programs that will be consolidated, merged or discontinued.

7.2 Distinguish clearly between coordination (aligning existing programs) and consolidation (replacing them with fewer, better ones), and commit to a consolidation target. Submitters were consistent that coordination without consolidation replicates the existing problem at a higher level.

7.3 Establish clear, public criteria for what the coordination architecture will and will not do - including explicit boundaries between Commonwealth and state/territory roles - to address the wide concern that the governance model risks replicating Commonwealth program proliferation at a new level.

What submitters said

> *"The proposal for SMART goals and triennial reviews would ensure accountability. We support the proposal for Commonwealth coordination to: align research needs with infrastructure; ensuring critical technologies are available; providing policy frameworks that encourage private capital investment; and ensuring investments are developed, implemented and evaluated with transparent ..."*
>
> — ANU Agrifood Innovation Institute (Paper 1, Submission #45)

> *"The model for a long-term national coordination approach to building scale and capability is described at a high level, that does not yet go into detail about the scale of funding proposed or how the approach would be funded."*
>
> — University of Sydney (Paper 2, Submission #97)

> *"Consolidation, without independent public-interest oversight, invites faster pipelines for high-stakes science and technology without necessary checks and balances."*
>
> — GeneEthics (Paper 3, Submission #107)

Recommendation 8: Fund the True Cost of Research and Commit to Public Investment

Evidence base: 200 of 475 submissions addressed this theme. (Paper 1: 32, Paper 2: 44, Paper 3: 48, Paper 4: 33, Paper 5: 32, Paper 6: 11)

Across 200 submissions, a consistent and concrete argument emerged: Australia systematically underfunds the full costs of research, and private capital cannot make up the difference. AAMRI quantified the problem: in 2023, medical research institutes faced a $786 million gap between the funding they received and the real cost of conducting research. This structural underfunding forces institutions to subsidise government-funded research from philanthropy and reserves, distorting their financial sustainability. The NT Cattlemen's Association argued that 'the focus on attracting private capital must not come at the expense of public co-investment.' Multiple submissions flagged the mismatch between the ten-year investment horizons research requires and the annual budget cycle and three-year electoral cycle that determines public funding - an acknowledged structural problem that the issues papers identified without proposing a solution.

Recommendations

8.1 Address the full indirect cost funding gap in publicly funded research - currently estimated at over $786 million annually for medical research institutes alone - as a precondition for reform, recognising that all other reforms are undermined when institutions must cross-subsidise government-funded research from private sources.

8.2 Commit to growing Australia's total R&D expenditure as a percentage of GDP toward OECD benchmarks, with a published, bipartisan-endorsed trajectory. Submitters noted that Australia's BERD and GERD ratios have declined relative to peers, and that no amount of structural reform can compensate for chronic underinvestment.

8.3 Establish endowment-style or multi-year funding vehicles for national research programs, explicitly designed to insulate long-term commitments from annual budget cycles - drawing on the Medical Research Future Fund as a proven model and extending it to other priority areas.

8.4 Retain and strengthen matched public funding in sector-based research partnerships (including Rural R&D Corporations and similar models), rejecting any framing that treats private capital leverage as a rationale for reducing the public contribution.

What submitters said

> *"First, the focus on attracting private capital must not come at the expense of public co-investment. For decades, the Rural RDC model has relied on the matched funding partnership between producers and government."*
>
> — NT Cattlemen's Association (Paper 4, Submission #33)

> *"ARMS supports the intent for long-term infrastructure planning but recommends clearer commitments to sustainable investment cycles. Current short-term funding arrangements limit institutions' ability to plan, maintain, and upgrade critical infrastructure."*
>
> — Australasian Research Management Society (ARMS) (Paper 5, Submission #72)

> *"The proposed long-term funding is sensible, but it is unclear how this would fit within the short-term government election cycle at both Federal and State levels, and annual budget processes. These considerations will be critical to achieving the long-term solution the SERD, and RDT&I stakeholders desire yet they are not even acknowledged let alone addressed."*

— University of Sydney (Paper 1, Submission #144)

Recommendation 9: Reduce Administrative Complexity Across the Entire RD&I System

Evidence base: 224 of 475 submissions addressed this theme. (Paper 1: 23, Paper 2: 49, Paper 3: 59, Paper 4: 36, Paper 5: 30, Paper 6: 27)

Regulatory and administrative burden appeared in 224 submissions, with a notable concentration in the file-based submissions from major industry bodies and universities - organisations with dedicated policy teams who nonetheless described the current program landscape as unnavigable. The SABRE Alliance documented 151 programs across 14 portfolios as the landscape a single organisation must navigate. Submitters argued that this complexity is not merely inconvenient: it systematically advantages large institutions with dedicated grants teams over smaller organisations, early-career researchers and SMEs without them. Harmonisation across programs was identified as a higher priority than launching new initiatives. Ethics approval delays and export control compliance were specifically called out as research blockers that impose costs disproportionate to their risk management value.

Recommendations

9.1 Conduct a mandatory simplification review of all Commonwealth RD&I programs, with a specific mandate to harmonise eligibility definitions, reporting requirements and assessment criteria across programs - reducing the navigational overhead that submitters consistently described as a disproportionate burden on smaller organisations.

9.2 Streamline ethics approval and export control processes for research, with risk-proportionate timelines that do not impose the same compliance overhead on low-risk collaborative research as on genuinely sensitive or dual-use activities.

9.3 Establish a single, standardised R&D activity definition applicable across the RDTI, competitive grants, and all other Commonwealth programs - eliminating the current situation where identical activities are 'eligible' under one program and 'ineligible' under another.

What submitters said

> *"Consider harmonising and simplifying a national framework and streamlined grant management (generalised for the whole RD&I approach) processes to reduce duplication and administrative burden. A fit-for-purpose grants management capability would increase efficiency and encourage industry participation."*
>
> — Campus Plus (Paper 6, Submission #46)

> *"- Align and harmonise eligibility tests and requirements across RD&I programs and incentives to reduce complexity. Simplifying access to funding will allow researchers to focus on innovation rather than navigating multiple, fragmented processes."*
>
> — Black Dog Institute (Paper 2, Submission #49)

> *"- Simplification of R&D tax processes: Many of FaBA's industry partners report that the current R&D Tax Incentive (RDTI) process is complex and difficult to navigate. FaBA supports efforts to simplify and streamline the RDTI to improve accessibility and reduce administrative burden, especially for smaller firms that are critical to innovation in the food and beverage sector."*
>
> — Australia's Food and Beverage Accelerator (FaBA) (Paper 3, Submission #47)

Recommendation 10: Centre Equity, First Nations Leadership and Regional Access in Every Reform

Evidence base: 209 of 475 submissions addressed this theme. (Paper 1: 36, Paper 2: 45, Paper 3: 41, Paper 4: 34, Paper 5: 31, Paper 6: 22)

Equity, First Nations inclusion and regional access appeared in 209 submissions. A key submitter argument - distinct from general diversity rhetoric - was that the structural design of competitive grant programs systematically excludes regional institutions, First Nations-led research organisations and smaller universities, because they lack the proposal-writing infrastructure and institutional networks of metropolitan research universities. Submitters also argued that First Nations communities must be genuine research partners and co-investors in national missions that affect their communities, not box-ticking consultees. TERN Australia called specifically for regional and place-based career pathways to be embedded in national missions around net zero, biodiversity and Indigenous land management. Several submissions noted that gender equity in STEM requires structural intervention at career transition points, not generic encouragement.

Recommendations

10.1 Embed equity requirements into the design of all competitive RD&I programs - not as add-on criteria but as structural constraints - including minimum set-asides for regional institutions, First Nations-led research and gender equity, with published data on outcomes annually.

10.2 Ensure First Nations communities hold genuine decision-making roles - not advisory roles - in the governance of national focus areas that affect their lands, waters and communities, with dedicated funding for First Nations-led RD&I embedded in each priority area.

10.3 Develop and fund regional and place-based innovation ecosystems explicitly, recognising that innovation concentrated in capital cities creates a self-reinforcing geographic divide that undermines both equity and national resilience.

What submitters said

> *"Ensure equity in access to scaling supports: Mechanisms should be introduced to ensure regional SMEs, underrepresented groups, and non-metropolitan institutions can access accelerators, mentorship, and investment opportunities. As we addressed in Issues Paper 1, strong regional representation is important to ensure national equity and to leverage distinctive place-based assets."*
>
> — University of Tasmania (Paper 3, Submission #16)

> *"Importantly, this should include support for regional and place-based career pathways. Achieving goals such as net zero emissions, biodiversity restoration and meaningful Aboriginal and Torres Strait Islander participation requires skilled people working in the communities most affected by these outcomes, not only in major cities."*
>
> — TERN Australia (Paper 5, Submission #10)

> *"CRA welcomes the call to simplify and harmonise grants processes, reduce red tape, and explore regulatory reform models like sandboxes and testbeds. These changes can reduce entry barriers for startups, SMEs, and collaborative entities, improving accessibility for underrepresented and regional groups."*
>
> — Cooperative Research Australia (Paper 6, Submission #16)

Recommendation 11: Reform University-Industry Collaboration Incentives

Evidence base: 205 of 475 submissions addressed this theme. (Paper 1: 24, Paper 2: 52, Paper 3: 51, Paper 4: 30, Paper 5: 33, Paper 6: 15)

University-industry collaboration appeared in 205 submissions. Submitters identified a specific structural problem: the incentive systems within universities - promotion criteria, grant success metrics, teaching loads - actively work against sustained industry engagement, regardless of how much rhetoric encourages it. Submitters called for a 'Collaboration Premium' in the RDTI - a higher offset rate (suggested at 20% additional) for companies that conduct R&D in genuine partnership with universities or public research organisations - rather than generic collaboration rhetoric. CRC-style programs were broadly praised as effective models, but submitters called for expansion and longer commitment horizons. Industry PhD programs were identified as high-value but structurally under-incentivised for industry partners.

Recommendations

11.1 Introduce a Collaboration Premium within the RDTI - a meaningfully higher tax offset rate for genuinely collaborative R&D between industry and universities or public research organisations - making collaboration an economically rational choice rather than a nice-to-have.

11.2 Reform university performance and promotion systems to reward industry engagement, co-produced research and applied impact, recognising that the current system structurally disincentivises the very behaviour that industry collaboration requires.

11.3 Expand and extend CRC-style programs with longer funding commitments, broader eligibility and clearer pathways for outcomes to flow back into the innovation ecosystem - drawing on their proven track record of aligning research with genuine industry needs.

What submitters said

> *"The paper fails to acknowledge the several research commercialisation programs already working to better connect university research with industry partners - i.e. Cooperative Research Centres, Australia's Economic Accelerator, the National Industry PhD Program, CSIRO Industry PhD program, Trailblazer Universities Program, the ARC Linkage Program and ARC Industry Fellowships."*
>
> — Science & Technology Australia (Paper 2, Submission #56)

> *"Sharpening R&DTI eligibility conditions to improve additionality and spillovers should be included in the reforms. This could include eligibility conditions that target business growth and ambition and incentivise collaboration with researchers and start-ups. The proposal to base ongoing eligibility on outcomes including revenue growth from R&D activity would support this."*
>
> — Australian Academy of Science (Paper 3, Submission #54)

> *"Many public funding bodies, such as the Australian Research Council (ARC), support both foundational and translational research. For example, the ARC's Linkage Program already facilitates industry collaboration. How will such programs be integrated or aligned with the new model without undermining their effectiveness? o How will the system preserve what is working?"*
>
> — sub Go8 1-4 (Paper 1, Submission #152)

Recommendation 12: Explicitly Protect Discovery Research from Mission-Creep

Evidence base: 148 of 475 submissions addressed this theme. (Paper 1: 31, Paper 2: 22, Paper 3: 22, Paper 4: 17, Paper 5: 49, Paper 6: 7)

Protection of investigator-led and discovery research appeared in 148 submissions. Submitters were not merely asking for balance in rhetoric - they argued that the structural momentum of a mission-oriented system will systematically redirect funding from discovery research without any explicit policy decision to do so. The University of Queensland argued that 'the greatest applications often emerge from curiosity-driven, long-horizon research' and that the framework lacks 'a safeguard to ensure that foundational research is preserved.' Multiple submissions warned that Australia's existing pipeline of breakthrough research would be depleted within a decade if the current direction continues, citing international evidence that countries which pursue applied research at the expense of discovery eventually lose their applied research capacity too. GeneEthics called specifically for 'quarantining baseline ARC and curiosity funding from mission and pillar claims.'

Recommendations

12.1 Legislate a minimum protected allocation for investigator-led discovery research - managed through the ARC's Discovery and other non-mission programs - that cannot be reallocated to focus areas without a specific parliamentary decision, protecting it from administrative mission-creep.

12.2 Restore and protect the ARC's operational independence and funding base, treating it as the primary statutory custodian of discovery research - not as a vehicle for delivering national focus area outcomes.

12.3 Design evaluation frameworks for discovery research that do not require short-term impact or commercialisation outcomes as conditions of funding, explicitly recognising that the value of fundamental research accumulates over decades and is not measurable within grant cycles.

What submitters said

> *"Paper 5 correctly identifies that translation and impact matter. What's missing is a safeguard to ensure that foundational research is preserved, recognising that the greatest applications often emerge from curiosity-driven, long-horizon research."*
>
> — The University of Queensland (Paper 5, Submission #63)

> *"The perceived lack of strategic direction for discovery based and investigator-led research - such as the Research Block Grant or ARC Discovery Scheme - is not a flaw that is holding back research translation."*
>
> — IRU (Paper 1, Submission #150)

> *"Overall, ANDHealth is extremely supportive of any efforts to improve foundational research and protect critical blue-sky, discovery research across Australia."*
>
> — ANDHealth (Paper 6, Submission #9)

Recommendation 13: Reform the R&D Tax Incentive to Restore Effectiveness and Additionality

Evidence base: 137 of 475 submissions addressed this theme. (Paper 1: 14, Paper 2: 37, Paper 3: 60, Paper 4: 24, Paper 5: 1, Paper 6: 1)

The RDTI attracted 137 submissions specifically focused on it, with a more technically sophisticated critique than previous reviews. RSM Australia identified a critical and largely unaddressed interaction: the OECD Pillar 2 global minimum tax rules effectively negate the RDTI for large multinational enterprises, because the domestic minimum top-up tax calculation treats non-refundable R&D offsets as tax benefits that reduce the effective tax rate, triggering the minimum tax before the R&D benefit is fully realised. This perverse interaction means the RDTI may be deterring - not attracting - MNE R&D investment in Australia. Smaller submitters focused on the uncertainty of the refundable offset for SMEs and the complexity of eligible activity definitions. Universities Australia supported contingency on ambition in principle but warned that certainty for SMEs must be protected.

Recommendations

13.1 Commission an urgent review of the interaction between the RDTI and OECD Pillar 2 global minimum tax rules, with a view to redesigning the RDTI so it does not inadvertently deter multinational R&D investment in Australia - an issue submitters identified as real, significant and completely unaddressed in the issues papers.

13.2 Strengthen the certainty and accessibility of the refundable R&D tax offset for SMEs - the most innovation-productive segment of the business sector - including through clearer eligible activity definitions, faster ATO determinations and a simplified compliance pathway for smaller claimants.

13.3 Introduce a genuine additionality requirement to the RDTI to ensure it funds net new R&D rather than activity that would have occurred regardless, improving the return on public expenditure and strengthening the programme's economic justification.

13.4 Build a Collaboration Premium into the RDTI - a higher offset rate for R&D conducted in partnership with Australian universities and public research organisations - creating a direct financial incentive for industry-research collaboration rather than incentivising R&D in isolation.

What submitters said

> *"That is, the domestic Pillar 2 provisions seek to impose an Australian domestic top up tax should the group's effective tax rate (ETR) fall below 15% and these calculations take into consideration the availability of non-refundable tax offsets, including the R&D tax offset."*
>
> — RSM Australia - (Paper 3, Submission #114)

> *"Similarly, making access to RDTI contingent on ambition and growth is something we agree with in principle. A key to this will be providing certainty for more SMEs with respect to the refundable nature of the tax offset."*
>
> — Universities Australia (Paper 2, Submission #59)

> *"The 100-point test alignment between RDTI and ESIC is encouraging but not comprehensive. We suggest expanding this to develop a "University Commercialisation Passport - a unified eligibility system covering R&D tax incentives, ESVCLP qualification, and government grant programs."*
>
> — University of Newcastle (Paper 4, Submission #1)

Recommendation 14: Clarify and Strengthen CSIRO and National Research Infrastructure

Evidence base: 157 of 475 submissions addressed this theme. (Paper 1: 21, Paper 2: 23, Paper 3: 29, Paper 4: 21, Paper 5: 43, Paper 6: 20)

National research infrastructure and CSIRO appeared in 157 submissions. A repeated concern was that the proposed coordination framework did not clearly articulate how CSIRO, the NCRIS network, NCI and Pawsey fit within the new structure - leaving open the question of whether these institutions would be reshaped to serve national focus areas, or maintained as independent national assets. The Australasian Research Management Society argued that 'current short-term funding arrangements limit institutions' ability to plan, maintain, and upgrade critical infrastructure.' The National Computational Infrastructure and Pawsey both argued for HPC and data infrastructure to be treated as national strategic assets rather than line items in research budgets.

Recommendations

14.1 Define CSIRO's mandate within the new coordination framework with statutory clarity - including what it will and will not be directed to do under national focus areas - and provide multi-year funding certainty that insulates CSIRO from annual budget pressures.

14.2 Develop a long-term National Research Infrastructure Plan with a minimum ten-year horizon, beginning with an independent audit of NCRIS facilities, gaps and sustainability, and providing predictable, multi-year funding that allows institutions to plan and invest in upgrades.

14.3 Designate high-performance computing, data infrastructure and AI research capability as national strategic assets with their own protected funding stream, recognising that these are not sector-specific resources but cross-cutting national capabilities.

What submitters said

> *"How to improve: The government should develop a long-term investment plan for a world-class, coordinated national research infrastructure network. This should begin with a national audit to identify gaps and opportunities."*
>
> — Australian Pain Solutions Research Alliance (Paper 2, Submission #13)

> *"CRA strongly supports the proposal to secure long-term funding and strategic governance for national research infrastructure, including NCRIS, under a coordinated model."*
>
> — Cooperative Research Australia (Paper 5, Submission #20)

> *"We strongly support efforts to streamline and simplify grant application and management processes. Current rules around eligible organisation types can limit participation by NCRIS capabilities, which are often hosted within universities rather than being standalone entities."*
>
> — TERN Australia (Paper 6, Submission #4)

Recommendation 15: Adopt a Proactive, Campaign-Oriented International Strategy

Evidence base: 156 of 475 submissions addressed this theme. (Paper 1: 21, Paper 2: 48, Paper 3: 26, Paper 4: 33, Paper 5: 10, Paper 6: 18)

International engagement appeared in 156 submissions. The dominant submitter argument was not simply that Australia should collaborate more internationally, but that Australia's current posture is passive - waiting for international interest rather than actively marketing its capabilities and pursuing specific partnerships. The Rozetta Institute argued Australia should 'package up compelling investment cases that meet Australia's needs and bang loudly on the front door of the people we want to do business with,' rather than creating 'an enticing front door in the hope someone knocks.' Association with Horizon Europe was raised by multiple major universities as the single highest-leverage international investment Australia could make, giving researchers access to a €95 billion research program and the networks, talent and facilities it supports.

Recommendations

15.1 Actively pursue Australian association with Horizon Europe, treating it as a strategic national priority rather than an aspiration - including dedicating the co-investment funds and diplomatic effort required to successfully negotiate entry.

15.2 Shift Australia's international research engagement posture from reactive to proactive - developing targeted investment cases for specific international partners and sectors rather than building general awareness and waiting for inbound interest.

15.3 Leverage AUKUS and QUAD frameworks specifically to unlock joint research programs in agreed technology domains, moving beyond security cooperation to genuine collaborative research investment with binding commitments on both sides.

What submitters said

> *"The framework's proactive approach to international collaboration through Austrade and trade missions aligns with SABRE's vision of positioning Australia's R&D capabilities globally."*
>
> — Safeguarding Australia through Biotechnology Response and Engagement (SABRE) Alliance (Paper 2, Submission #16)

> *"We disagree with creating an enticing 'front door' in the hope someone knocks. Rather, let's package up compelling investment cases that meet Australia's needs and bang loudly on the front door of the best international partners to join us."*
>
> — Rozetta Institute (Paper 6, Submission #17)

> *"Although global investor engagement is acknowledged, no specific mechanisms are provided. The University of Newcastle suggests creating 'Australia-Asia Innovation Bridges' to harness regional strengths and international collaborations particularly in the Asia Pacific."*
>
> — University of Newcastle (Paper 4, Submission #1)

Recommendation 16: Reform IP Frameworks and Establish Open Access as the Default

Evidence base: 124 of 475 submissions addressed this theme. (Paper 1: 17, Paper 2: 34, Paper 3: 31, Paper 4: 18, Paper 5: 18, Paper 6: 6)

Intellectual property, open access and data sharing appeared in 124 submissions. The most consistent argument was that current IP frameworks in Australian universities are a direct barrier to commercialisation - not a facilitator. Institutional IP ownership rules that demand equity stakes as a condition of licensing were described as deterring both researcher-led ventures and industry partnerships. Equally prominent was the argument for making open access the default for publicly funded research outputs, enabling the broader economy to build on publicly funded knowledge. TERN Australia highlighted that AI-assisted labelling of existing research data - made openly available - could itself become a major national innovation infrastructure asset.

Recommendations

16.1 Reform university IP ownership frameworks to allow researchers to lead the commercialisation of their own publicly funded discoveries, including through flexible licensing, founder equity participation and simplified spinout pathways that do not require institutional equity as a precondition.

16.2 Mandate open access publication of all research outputs from Commonwealth-funded research programs, eliminating the structural barrier that prevents industry, innovators and other researchers from building on publicly funded knowledge without paywalled access.

16.3 Invest in AI-assisted labelling, tagging and structuring of existing publicly funded research data to make it machine-readable and industry-usable - treating the national research data estate as a platform for innovation, not a byproduct of past grants.

What submitters said

> *"Recommendation 5: Invest in research data infrastructure to support open access and open data while instituting open access and open data requirements for government-funded research."*
>
> — Australian Academy of Technological Sciences and Engineering (Paper 2, Submission #34)

> *"Recommendation 5: Invest in research data infrastructure to support open access and open data while instituting open access and open data requirements for government-funded research."*
>
> — Australian Academy of Technological Sciences and Engineering - (Paper 1, Submission #166)

> *"Foundational research thrives on open exchange. Policies should promote open science, encouraging data sharing, open access publishing, and international collaboration, alongside guidance on balancing publication with patenting."*
>
> — Dr Parham Sahandi-Zangabad (personal submission, Monash University affiliation) (Paper 5, Submission #54)

Recommendation 17: Establish Net Zero and Environmental Research as a Flagship National Mission

Evidence base: 231 of 475 submissions addressed this theme. (Paper 1: 31, Paper 2: 53, Paper 3: 57, Paper 4: 38, Paper 5: 31, Paper 6: 21)

Climate, clean energy and environmental research appeared in 231 submissions, often framed not as a sector-specific priority but as a systemic condition of Australia's long-term economic and social viability. Submitters argued that the proposed focus area framework could easily produce a net zero mission in name while systematically underfunding the full spectrum of research required - from critical minerals to biodiversity, from green hydrogen to nature-based solutions. TERN Australia specifically called for biodiversity, ecosystem monitoring and environmental data to be embedded within the net zero mission rather than siloed as 'environmental research' separate from the mainstream innovation agenda.

Recommendations

17.1 Designate the net zero and sustainability transition as a flagship national mission with a dedicated, quarantined research investment stream that spans the full research pipeline from discovery to deployment - not merely a label applied to existing programs.

17.2 Integrate biodiversity, ecosystem monitoring, nature-based solutions and environmental data infrastructure within the net zero mission rather than treating them as separate environmental programs, recognising their interdependence with energy transition, land management and food security.

17.3 Align Commonwealth and state government emissions reduction R&D investments under the national mission framework to eliminate duplication and build the scale needed to compete internationally in critical minerals, clean energy technology and carbon markets.

What submitters said

> *"- The selection of key priority sectors is appropriate. ATN member universities are already leaders in many fields directly relevant to these priorities, such as applied technology, engineering, built environment, net zero/energy transition, health, and climate resilience."*
>
> — ATN Universities (Paper 1, Submission #58)

> *"Importantly, this should include support for regional and place-based career pathways. Achieving goals such as net zero emissions, biodiversity restoration and meaningful Aboriginal and Torres Strait Islander participation requires skilled people working in the communities most affected by these outcomes, not only in major cities."*
>
> — TERN Australia (Paper 5, Submission #10)

> *"Reforming public-funded research agencies (PFRAs) for the public good. To clarify CSIRO and related agencies' mandates and ensure collaboration rather than competition with universities are positive. Greater alignment around national public-interest goals - sustainability, biodiversity, social well-being - instead of commercialisation or military contracts."*
>
> — GeneEthics (Paper 6, Submission #40)

Recommendation 18: Position Australia as a Global Health and Medical Research Hub

Evidence base: 102 of 475 submissions addressed this theme. (Paper 1: 20, Paper 2: 21, Paper 3: 18, Paper 4: 20, Paper 5: 15, Paper 6: 8)

Health and medical research appeared in 102 submissions. While broadly supportive of increased investment, submitters focused on specific structural reforms: the fragmentation of health research funding across MRFF, NHMRC and numerous departmental programs was identified as an inefficiency that the SERD papers did not adequately address. Several submissions - including AAMRI - called for a single consolidated health research funding framework, while noting that independent medical research institutes face a $786 million annual funding gap between what they receive and the true cost of their research. Non-animal research methods were raised as both an ethical and a scientific priority, with submissions noting that Australia is falling behind international peers in adopting and funding new approach methodologies.

Recommendations

18.1 Consolidate Commonwealth health and medical research funding into a single coherent framework - addressing the fragmentation across MRFF, NHMRC and departmental programs that submitters identified as producing duplication, coverage gaps and institutional instability.

18.2 Address the full cost funding gap for independent medical research institutes, which operate at significant annual deficits between public funding and true research costs, threatening the sustainability of institutions that provide a significant share of Australia's health research output.

18.3 Invest in clinical trials infrastructure to make Australia a globally competitive location for pharmaceutical R&D, including streamlining TGA approval pathways and developing national biobanking and patient cohort infrastructure that industry can access.

What submitters said

> *"The framework could be strengthened by explicitly recognising non-animal research methods (NAMs) as a national priority and global opportunity. NAMs are increasingly sophisticated, often outperform traditional animal models and are rapidly being adopted in major pharmaceutical markets such as the US and EU."*
>
> — Animal-Free Science Advocacy (Paper 5, Submission #8)

> *"Medicines Australia welcomes the opportunity to make a submission to the SERD Issue Paper 3: RD&I incentives. Our submission builds on the medicines and biopharmaceutical sectors prior input and provides new evidence and practical policy additions to ensure Australia attracts and retains globally competitive life sciences R&D, clinical trials, and advanced biomanufacturing."*
>
> — Medicines Australia (Paper 3, Submission #29)

> *"National Strategy: The proposed framework needs to be guided by an overarching national strategy for each 'Focus Area'. A whole-of-government National Life Sciences strategy would bring Australia in line with other countries competing for global investment and building their national capabilities."*
>
> — AusBiotech (Paper 1, Submission #54)

Recommendation 19: Build a Coherent Defence and Sovereign Capability Research Strategy

Evidence base: 130 of 475 submissions addressed this theme. (Paper 1: 30, Paper 2: 20, Paper 3: 29, Paper 4: 23, Paper 5: 10, Paper 6: 18)

Defence, national security and sovereign capability appeared in 130 submissions. Submitters broadly supported greater integration of defence and civilian research but identified a specific gap: Australia lacks a coherent framework for dual-use R&D that would allow civilian and defence researchers to collaborate effectively while managing appropriate security obligations. AUKUS was consistently cited as a transformative but underutilised opportunity - with submitters arguing that the research and technology dimensions of the AUKUS partnership need dedicated investment, not just procurement arrangements. Security frameworks were identified as an enabler that has become an obstacle: the classification and access control systems for sensitive research are slow, inconsistent and disproportionate to actual risk levels for most research activities.

Recommendations

19.1 Develop an explicit national dual-use R&D strategy that creates coherent frameworks for collaboration between civilian and defence researchers in agreed priority technology domains, with proportionate and consistent security arrangements that enable rather than obstruct collaboration.

19.2 Capitalise on AUKUS as a research cooperation framework, not merely a procurement arrangement - investing in joint research programs with the US and UK in advanced technologies where Australia has complementary capabilities and can build genuine sovereign expertise.

19.3 Reform the security clearance and access control framework for research to be risk-proportionate - applying the highest levels of restriction only to genuinely sensitive activities, and streamlining the process for the large volume of research that poses low security risk but currently faces significant delays.

What submitters said

> *"Most importantly, the proposals recognize that effective incentives must reward the kind of dual-use innovation that SABRE champions, where research serves both civilian and defence applications, creating multiple pathways to market while addressing national security needs."*
>
> — Safeguarding Australia through Biotechnology Response and Engagement (SABRE) Alliance (Paper 3, Submission #12)

> *"1.1 Focus Areas / National Missions. We strongly support the model's alignment with a mission-oriented approach, consistent with our own Arena Mars strategy. Framing RD&I priorities around National Missions is the right focus."*
>
> — Arena Mars (Paper 1, Submission #5)

> *"Australia has an opportunity to extend the focus of sovereign capability wider than manufacturing to include R&D and see this as a route to both economic growth, global investment and national security. Without PPPs, Australia misses a proven mechanism to anchor industry trials, expand regional access, and crowd in private capital, weakening our precision medicine edge."*
>
> — Medicines Australia (Paper 4, Submission #15)

Recommendation 20: Build a National RD&I Measurement and Accountability Framework

Evidence base: 305 of 475 submissions addressed this theme. (Paper 1: 44, Paper 2: 67, Paper 3: 71, Paper 4: 33, Paper 5: 55, Paper 6: 35)

Research evaluation and impact measurement appeared in 305 submissions. The dominant submitter argument was that Australia cannot manage what it does not measure - and currently measures the wrong things. Publication counts and citation metrics were widely criticised as proxies that actively distort research behaviour, rewarding volume over impact and individual output over collaboration. Research Australia called specifically for mandatory public RD&I reporting, restoration of ABS survey funding, and a longitudinal national dashboard. Submitters also argued that the impact measurement framework must be designed before - not after - national missions are committed to, so that programs can be held accountable against meaningful outcomes rather than retrofitted with metrics that justify whatever was done.

Recommendations

20.1 Design a national RD&I performance measurement framework as a precondition for mission commitment - not as a post-hoc accountability add-on - with metrics spanning economic, social, environmental and cultural impact that are agreed with research communities before programs begin.

20.2 Restore ABS R&D survey funding and mandate public reporting of R&D expenditure by sector, institution type, funding source and research domain, creating the longitudinal national dataset that submitters identified as a basic requirement for evidence-based policy that Australia currently lacks.

20.3 Reform research assessment and institutional funding allocation to reduce reliance on bibliometric outputs - drawing on international models such as the UK's Research Excellence Framework - and to reward collaborative, interdisciplinary and applied contributions alongside traditional publications.

What submitters said

> *"Finally, to ensure that the new incentives are driving genuine innovation, they must be underpinned by a robust and transparent evaluation framework. This should go beyond simple measures of R&D expenditure to assess the impact of the incentives on a range of outcomes, including the creation of new businesses, the development of novel technologies, and the growth of high-value ..."*
>
> — Institute for Photonics and Advanced Sensing (Paper 3, Submission #11)

> *"- ATN Universities welcomes the recommendation for a small number of long-term national focus areas with 10-year plans; this will provide clarity and durability. We also support the emphasis on impact, enabling capabilities and evaluation."*
>
> — ATN Universities (Paper 1, Submission #58)

> *"- Evaluation and accountability - The Treasury's Centre for Evaluation could measur the impact of these investment mechanisms, including spillover benefits and contributions to economic complexity."*
>
> — Russell Yardley (Paper 4, Submission #14)