

SERD Submission Analysis vs Final Report

Comparison of Recommendations and Themes

Ambitious Australia Final Report (December 2025) vs Thematic Analysis of 475 Submissions

Overview

This document compares the recommendations in the Ambitious Australia: Strategic Examination of R&D Final Report (December 2025) with the thematic analysis drawn from all 475 public submissions across the six SERD Issues Papers. The submission analysis reflects what submitters actually argued — their diagnoses of system failures, their criticisms of proposed changes, and their reform proposals. The final report reflects the independent expert panel's conclusions after weighing all inputs.

The comparison is structured around four alignment categories:

- Strong Agreement — substantive alignment on both diagnosis and prescription
- Partial Agreement — shared direction but significant differences in framing, scope or mechanism
- Significant Difference — the final report's position diverges materially from submitter consensus
- No Counterpart — a theme prominent in submissions is absent from the report, or vice versa

Summary: Areas of Alignment and Divergence

Where submissions and the final report strongly agree

The final report and the submission record share the strongest alignment on capital and investment reform (Rec 5 / Recs 8–11): both diagnose the same structural gaps in angel investment, VC scale, superannuation deployment, and exit pathways. Workforce development is another area of genuine convergence (Rec 6 / Recs 12–13), with both identifying the need for industry-connected PhD training and a national talent strategy. Administrative simplification (Rec 9 / Rec 17) and the need for outcome-based measurement (Rec 20 / Rec 19) are also well-aligned.

Where submissions and the final report partially agree

The broadest category. Both agree on the need for national coordination, but submitters wanted a comprehensive national RD&I strategy as the starting point, whereas the final report begins with a governance architecture (the National Innovation Council and pillars) and deduces strategy from it. Both agree that competitive grants have declined and research infrastructure is underfunded, but submissions named a specific funding gap (\$786 million for Medical Research Institutes alone) and demanded it be closed, whereas the report calls only for determining the full cost — without a funding commitment. Both agree on RDTI reform, but submissions raised the interaction with OECD Pillar 2 global minimum tax rules, which the report does not address.

Where the final report diverges from submitter consensus

University research specialisation (Rec 3 of the final report) was the most striking divergence. Submissions actively and repeatedly argued against reducing research breadth requirements, warning that specialisation would destroy institutional diversity and further erode the discovery research base. The panel adopted this recommendation despite substantial opposition in the consultation record.

Governance independence (Rec 4 of the submission analysis / Rec 1a of the final report). Submitters — particularly the independent sector and many research organisations — argued strongly for a governance body insulated from political and industry capture, with statutory independence. The final report places the National Innovation Council directly under the Prime Minister and Minister for Industry, which was precisely the governance model submitters warned against.

Mission framework rigidity (Rec 2 of the submission analysis / Rec 1b of the final report). Submissions warned against locking in narrow, predetermined focus areas — arguing that the selection process could be captured by incumbent industries and that enabling technologies should be horizontal capabilities, not a single pillar among six. The report prescribes exactly six fixed pillars, including 'Technology' as one pillar among equals — the structure submitters cautioned against.

Themes prominent in submissions but absent from the final report

Three significant themes that featured prominently in the submission record have no standalone recommendation in the final report:

- International collaboration and positioning (Rec 15 of the submission analysis): 156 submissions addressed this theme, calling for proactive international research partnerships, improved researcher visa settings, and recognition of Australia's 'brain drain' to global research centres. The final report mentions international competitiveness in passing but has no dedicated recommendation.
- Intellectual property reform and open access (Rec 16): IP frameworks and open access mandates featured strongly in submissions, particularly from universities and publicly funded research agencies arguing that current IP arrangements deter spinouts and restrict public access to publicly funded research. The final report does not address this.
- Full cost of research funding gap (Rec 8): Submissions — especially from AAMRI and medical research institutes — quantified a specific \$786 million annual funding gap between allocated funds and the real cost of research. The report's Rec 2b calls for 'determining' the full cost but stops short of committing to close the gap.

Themes in the final report with no strong submission counterpart

- Production tax credit for advanced manufacturing (Rec 7): The panel's recommendation for a tax credit or subsidy to retain advanced manufacturing in Australia was not a prominent theme in submissions, which focused more on commercialisation pathways than on manufacturing retention incentives.
- National narrative on RD&I (Rec 20): While cultural change around risk and innovation was mentioned in submissions, elevating this to a formal standalone recommendation is largely the panel's own framing.
- Competitive corporate tax rate (Rec 16 of the final report): Submissions rarely raised Australia's general corporate tax rate. This reflects the panel's own economic and competitiveness framing rather than the submission record.

Recommendation-by-Recommendation Comparison

The table below maps each recommendation from the submission analysis to its counterpart (or absence thereof) in the Ambitious Australia final report. Content width uses landscape A3-style layout for readability.

Submission Analysis (475 submissions)	Ambitious Australia Final Report	Alignment	Key Difference
Rec 1: Develop an Overarching National RD&I Strategy	Rec 1a–d: National Innovation Council + 6 Innovation Pillars + NSACs + NSIs	Partial Agreement	<i>Both call for national coordination, but submissions wanted a strategy first, architecture second</i>
Rec 2: Redesign Mission Framework to Avoid Narrow Predetermination	Rec 1b: 6 fixed pillars (Health, Agriculture, Defence, Energy, Resources, Technology)	Significant Difference	<i>Submissions warned against locking in sectors; report prescribes exactly 6 fixed pillars</i>
Rec 3: Remove Structural Barriers to Commercialisation	Recs 5–7: RDTI reform, SME support mechanism, production tax credit	Partial Agreement	<i>Submissions focused on IP/incentive structures; report focuses on tax settings</i>
Rec 4: Establish Genuinely Independent RD&I Governance	Rec 1a: NIC reports to PM and Minister for Industry	Significant Difference	<i>Submissions demanded independence from political/industry capture; report places NIC directly under PM</i>
Rec 5: Build Deep Tech & SME Ecosystems Through Capital Reform	Recs 8a–b, 9, 10, 11: Angel/VC expansion, super reform, FOF, exit pathways	Strong Agreement	<i>High alignment — both diagnose the same capital gaps</i>

Submission Analysis (475 submissions)	Ambitious Australia Final Report	Alignment	Key Difference
Rec 6: Rebuild Research Workforce Pipeline	Recs 12a–b, 13a–b: Industry-focused PhD training, stipends, workforce strategy	Strong Agreement	<i>Broad alignment, though submissions emphasised casualisation and career precarity more</i>
Rec 7: Make Coordination Reform Actually Reduce Fragmentation	Rec 17: Streamline grants and funding processes	Partial Agreement	<i>Report's streamlining is narrower; submissions called for rationalising programs wholesale</i>
Rec 8: Fund the True Cost of Research	Rec 2a–b: Reverse grant decline; determine indirect cost support	Partial Agreement	<i>Report calls for determining full cost; submissions named a specific \$786M MRI funding gap and demanded it be closed</i>
Rec 9: Reduce Administrative Complexity	Rec 17: Streamline grants/funding with proportionate risk appetite	Strong Agreement	<i>Broad agreement on direction</i>
Rec 10: Centre Equity, First Nations & Regional Inclusion	Rec 14: NIC prioritise First Nations RD&I and pre-accelerator network	Partial Agreement	<i>Report focuses on First Nations entrepreneurship; submissions also stressed equity in research careers and regional access to infrastructure</i>
Rec 11: Reform University–Industry Collaboration Incentives	Rec 6: Funding mechanism for businesses ineligible for RDTI to access university research	Partial Agreement	<i>Similar intent, but submissions wanted structural incentive reform inside</i>

Submission Analysis (475 submissions)	Ambitious Australia Final Report	Alignment	Key Difference
			<i>universities, not just a grant mechanism for business</i>
Rec 12: Explicitly Protect Discovery Research from Mission-Creep	Rec 2c: ARC/NHMRC balance pillar support with independent research (HASS and STEM)	Partial Agreement	<i>Rec 2c gestures at balance; submissions warned that Rec 3 (university specialisation) directly threatens discovery breadth</i>
Rec 13: Reform RDTI to Restore Effectiveness and Additionality	Recs 5a–d: RDTI simplification, startup stream, SME stream, corporate stream	Partial Agreement	<i>Both agree on RDTI reform, but submissions raised OECD Pillar 2 interaction and additionality testing that the report does not address</i>
Rec 14: Clarify and Strengthen CSIRO and National Research Infrastructure	Recs 4a–d, 18a–b: NCRIS funding, NIC oversight of infrastructure, CSIRO pillar alignment	Strong Agreement	<i>Broad alignment; submissions were more protective of CSIRO's independence than report's pillar-alignment framing</i>
Rec 15: Adopt Proactive International Strategy	No direct counterpart (international collaboration mentioned in passing only)	No Counterpart	<i>Submissions ranked international positioning highly; the final report has no standalone recommendation on this</i>
Rec 16: Reform IP Frameworks and Open Access as Default	No direct counterpart	No Counterpart	<i>IP frameworks and open access</i>

Submission Analysis (475 submissions)	Ambitious Australia Final Report	Alignment	Key Difference
			<i>were prominent in submissions but absent from the final report's recommendations</i>
Rec 17: Net Zero and Environmental Research as Flagship Mission	Rec 1b: 'Environment and Energy' is one of 6 pillars	Partial Agreement	<i>Submissions called for a dedicated mission at scale; report subsumes it into one of six equal pillars</i>
Rec 18: Position Australia as Global Health and Medical Research Hub	Rec 1b: 'Health and Medical' is one of 6 pillars	Partial Agreement	<i>Same as above — subsumed into pillar structure without dedicated investment commitment</i>
Rec 19: Build a Coherent Defence and Sovereign Capability Research Strategy	Rec 1b: 'Defence' is one of 6 pillars	Partial Agreement	<i>Submissions called for sovereign capability framing; report lists Defence as a pillar but does not address strategic tension with open science</i>
Rec 20: Build a National RD&I Measurement and Accountability Framework	Rec 19: NIC develop outcome-focused Performance Framework with SMART metrics	Strong Agreement	<i>High alignment — both call for outcomes-based measurement</i>

Final report recommendations with no submission counterpart

Submission Analysis (475 submissions)	Ambitious Australia Final Report	Alignment	Key Difference
No direct counterpart	Rec 7: Production tax credit/subsidy for advanced manufacturing resulting from RD&I	No Counterpart	<i>Submissions did not prominently call for a production tax credit; this is the panel's own initiative</i>
No direct counterpart	Rec 16: Competitive corporate tax rate for RD&I companies	No Counterpart	<i>Submissions rarely raised corporate tax rate; this reflects panel's own economic framing</i>
No direct counterpart	Rec 20: National narrative on RD&I benefits	No Counterpart	<i>Submissions raised cultural change in passing; the panel has elevated this to a formal recommendation</i>
No direct counterpart	Rec 3: University research specialisation (reduce breadth requirements)	Significant Difference	<i>Submissions actively warned against this; the panel adopted it despite strong opposition in the consultation record</i>

Detailed Analysis of Key Divergences

1. Governance Independence

The most fundamental structural divergence concerns the independence of the proposed coordination body. Across 235 submissions on the national coordination theme, a consistent argument emerged that Australia's RD&I governance failures stem from political short-termism and industry capture of research priorities. Submissions from organisations including the Federation of Australian Scientific and Technological Societies (FASTS), the Australian Academy of Science, GeneEthics, and many individual researchers called for a statutory, genuinely independent body with fixed terms, transparent conflict-of-interest rules, and insulation from electoral cycles.

The final report's National Innovation Council (Rec 1a) is established by Cabinet and reports directly to the Prime Minister and the Minister for Industry. This is precisely the governance model submitters warned against. The report does not address the conflict-of-interest concerns raised in submissions, nor does it provide for mechanisms to prevent capture by the industries that stand to benefit most from directing research investment.

2. University Research Specialisation

Recommendation 3 of the final report — allowing universities to reduce the condition for research breadth and specialise — represents the clearest case where the panel diverged from submitter consensus. Multiple submissions, including those from smaller universities, regional universities, and humanities and social science faculties, argued that research breadth requirements are not a source of inefficiency but a necessary protection for intellectual diversity, local community relevance, and the unpredictable nature of discovery.

The Group of Eight universities, by contrast, broadly supported specialisation as a path to global competitiveness. The final report appears to have adopted this position without adequately weighing the regional and disciplinary equity arguments made in submissions from institutions that would be most adversely affected. The submission analysis (Rec 12) specifically argued that discovery research must be explicitly protected from mission-driven narrowing — a concern the report's Rec 2c only partially addresses.

3. Mission Framework Rigidity vs Adaptive Design

Submitters across all six papers argued that the mission framework should be designed for adaptation — able to incorporate emerging sectors, technologies and societal challenges as they arise, rather than locking in a fixed structure. Many submissions cited the pace of AI and quantum technology development as proof that rigid sectoral structures will quickly become obsolete.

The final report's six fixed National Innovation Pillars (Rec 1b) — Health, Agriculture, Defence, Environment and Energy, Resources, and Technology — reflect the legacy composition of Australia's funded research base rather than a forward-looking prioritisation process. Submissions from the humanities, social sciences, cultural industries and service sectors noted with concern that none of the six pillars explicitly accommodates their fields. The report's concession in Rec 2c that the ARC and NHMRC should balance pillar support with independent HASS research is a significant qualifier, but it does not resolve the structural bias baked into the pillar definitions.

4. RDTI Reform and OECD Pillar 2 Interaction

Both the submission record and the final report agree that the R&D Tax Incentive needs reform. However, submissions from RSM Australia, Deloitte, PwC and several large corporations raised a specific and unresolved issue: the interaction between an enhanced RDTI (particularly one with above-the-line rate increases) and the OECD Pillar 2 Global Minimum Tax rules, which Australia has committed to implementing. Under Pillar 2, a top-up tax may apply if an RDTI concession reduces a firm's effective tax rate below 15%. This means that for large multinational firms — precisely those that Recs 5d and 7 of the final report target — an enhanced RDTI may be partially or wholly clawed back through the Pillar 2 mechanism, substantially reducing its effectiveness.

The final report does not address this interaction. The submission analysis (Rec 13) specifically called for the RDTI design to be tested against the Pillar 2 framework before implementation.

5. Full Cost of Research Funding

The Association of Australian Medical Research Institutes (AAMRI), Universities Australia, and the Group of Eight all submitted detailed evidence on the structural underfunding of indirect research costs. AAMRI quantified a \$786.2 million annual gap between allocated funding and the real cost of conducting research at Medical Research Institutes alone. This figure was cited across multiple papers and became one of the most specific, evidenced claims in the entire submission record.

The final report's Rec 2b calls for determining the full cost of research and reversing declines in indirect cost support rates. This is directionally correct but stops short of the commitment submissions demanded: a funded, time-bound plan to close the gap. 'Determining' the full cost is insufficient if the determination is not accompanied by a credible mechanism to fund it. Many submitters noted that this determination has effectively been made multiple times over the past decade without resulting in adequate funding.

Conclusion

The Ambitious Australia final report adopts or partially adopts the majority of themes that emerged from the submission record. The strongest areas of alignment are capital and investment reform, workforce development, administrative simplification, and outcome-based measurement. These reflect genuine convergence between submitter priorities and panel conclusions.

The most significant divergences — governance independence, university specialisation, mission framework rigidity, and the RDTI/Pillar 2 interaction — are not minor technical differences. They reflect substantive disagreements about the architecture of reform. In each case, the panel's position prioritises structural boldness and economic integration over the precautionary, independence-protecting instincts that characterised the bulk of the submission record.

Whether that reflects appropriate weighing of competing evidence, or a departure from submitter consensus in favour of the panel's own framework, is a question that government will need to assess in its response. This comparison document provides the evidentiary basis for that assessment.

Based on thematic analysis of 475 submissions across SERD Issues Papers 1–6 | March 2026