

UQ Response: Australian Tertiary Education Commission Review of Research Requirements: Australian University Category



1. Executive Summary

The University of Queensland (UQ) supports the Australian Government's objective of enabling greater institutional differentiation and providing universities with more flexibility to build research scale in areas of demonstrated strength. A carefully designed model of research specialisation could support clearer institutional missions, more targeted investment and stronger research outcomes. Its success, however, will depend on reform being considered as part of a broader vision for a differentiated, connected and sustainable Australian research system, rather than simply as a change to the minimum regulatory requirements for individual institutions.

UQ considers that system-wide comprehensiveness does not need to be replicated within every university. It can instead be achieved through complementary institutional missions and effective networks among research-intensive, mid-scale, regional and specialised universities. The Australian Government, through ATEC and TEQSA, could put enabling structures in place to support such a model, while preserving institutional autonomy and universities' capacity to shape their own distinct missions. Under such a model, institutions could concentrate capability in areas of strength while drawing on shared infrastructure, expertise, governance and research support services. Larger research-intensive universities could play an important role in supporting capability across the system, including through partnerships organised around geography, discipline or shared national priorities.

Any specialised model should preserve high expectations for university-level research. Reduced breadth should be balanced by demonstrable depth, quality, scale and sustainability in nominated areas, assessed in a way that is appropriate to different disciplines and research models. The model should also recognise that specialisation may occur not only by Field of Research, but by type of research activity, including discovery, applied, mission-driven, translational and interdisciplinary research.

Reform should also maintain the connection between research, scholarship, teaching and student experience. Changes to institutional research profiles may affect workforce composition, curriculum renewal, higher degree pathways and access to contemporary disciplinary expertise. These risks may be particularly significant for regional students and communities. Safeguards should therefore ensure that specialisation does not unintentionally narrow educational opportunity, weaken research-informed teaching, reduce opportunities for high-quality research training, or create gaps in national capability.

The sector lacks a shared national framework to inform what constitutes world standard research, how it should be evidenced and the extent to which Australia has the depth and breadth of capability required for the future. UQ recommends that the development of such a framework should be informed by the recent Strategic Examination of Research and Development (SERD) report. Such a framework should be transparent, proportionate and capable of recognising excellence across disciplines, including fields for which citation-based measures are not appropriate. Implementation should be staged, with appropriate grandfathering, clear transitional pathways and minimal additional burden for institutions.

A sustainable specialised model will also require appropriate incentives and funding. Collaboration and shared capability can improve efficiency, but they do not remove the cost of maintaining research infrastructure, integrity systems, specialist workforces and other essential research enablers. Reform should therefore be accompanied by consideration of the full cost of research and the mechanisms needed to sustain excellence across the sector.

Core recommendations

UQ recommends that the Australian Government and ATEC:

1. Recognise the importance of maintaining a group of comprehensive research-intensive universities to underpin sovereign research capability, enable interdisciplinary and transdisciplinary research innovation, and maintain teaching breadth.
2. Develop a system-wide model for research specialisation that defines how institutions selecting different research missions and scales would contribute to a differentiated but connected national research system.
3. Enable and support networked capability, including partnerships through which universities can share infrastructure, expertise, governance and research support services while maintaining institutional autonomy and clear accountability for quality.
4. Define depth, excellence and sustainability broadly, taking account of Fields of Research, types of research activity, interdisciplinary approaches and different disciplinary contexts.
5. Establish and test a credible national research framework before amending the Threshold Standards, ensuring that Australia's research landscape is representative across disciplines and recognises research contributions beyond citation-based measures.
6. Protect research-informed teaching, student opportunity and national disciplinary capability through explicit safeguards, monitoring and appropriate responses to regional and equity impacts.
7. Align reform with sustainable research funding, including the indirect costs associated with infrastructure, research integrity, governance, specialist capability and collaboration.

UQ would welcome continued engagement with ATEC and the sector as the model is developed, including further consultation on the national research framework, safeguards, funding arrangements and transition provisions.

2. Response to the consultation questions

2.1 **How should research depth, scale and sustainability be demonstrated under a more specialised model, including in relation to staffing, infrastructure, governance, research training, research integrity and research security?**

The University of Queensland (UQ) supports the principles at the heart of the consultation paper. In our previous submission to the Australian Universities Accord discussion paper in [March 2023](#), we recommended that the Department:

Encourage the development of a higher education sector where comprehensiveness is achieved through a network of partner institutions rather than through the activities of each individual university.

The research specialisation model presented in the consultation paper considers specialisation largely at the level of individual institutions. UQ considers that research quality, depth and sustainability in specialised institutions will be best supported through a broader

vision for the sector in which universities with different missions and scales are enabled to work collaboratively.

There is an important role for larger-scale, comprehensive universities in supporting quality and capability across the sector. This could include supporting smaller and regional universities to specialise by providing access to capability through networks organised around geography, discipline or shared priorities.

A more comprehensive model is therefore needed to understand how universities who choose to pursue research specialisation could be supported and sustained. This model should consider how different segments of the university research landscape could be enabled to operate and interact, from large, comprehensive research-intensive universities and broad mid-scale institutions to smaller, regional and specialised providers. If research quality is to be maintained across these different settings, research-intensive institutions could make an important contribution through networks based on geographic or Field of Research configurations. The case study below details how Australia's Food and Beverage Accelerator (FaBA) has been enabled by cross-institutional collaboration, delivering value and research impact for industry, government, and the broader community.

Case study: Australia's Food and Beverage Accelerator (FaBA)

Australia's Food and Beverage Accelerator (FaBA) demonstrates how research specialisation can be strengthened through collaboration. Established through the Australian Government's Trailblazer Universities Program, FaBA brings together The University of Queensland, Queensland University of Technology, and the University of Southern Queensland in a shared, food industry-focused innovation ecosystem. Each partner contributes distinct strengths, capabilities, and infrastructure, creating a coordinated national research capability that spans fundamental research, pilot-scale manufacturing, commercialisation, and workforce development. This model enables institutions operating at different scales and capacity to participate in nationally significant research while maintaining their own areas of expertise and focus.

Since its establishment in 2022, FaBA has leveraged \$50 million in Commonwealth investment to attract more than \$130 million in industry and university co-investment, supporting over 50 industry-led R&D projects, engaging more than 700 SMEs through regional networks, and creating new pathways for students, researchers, and industry professionals for training and collaboration. A defining feature of the model is the integration of complementary facilities across partner universities, including shared access to laboratory, pilot-scale and manufacturing infrastructure, and workforce development programs. This distributed model strengthens capability across the participating institutions while lowering barriers for businesses, 53% of which are engaging with university research for the first time.

FaBA's achievements demonstrate how collaborative research specialisation can deliver tangible economic and societal benefits. The partnership has supported the development of new food and beverage products, advanced emerging industries such as precision fermentation, strengthened workforce capability through industry PhDs, internships, and secondments, and enabled major multi-institutional projects such as the Eclipse Ingredients initiative involving UQ, QUT, and CSIRO. By aligning research priorities with industry demand and combining the strengths of institutions operating at different scales, FaBA has created a model that enhances research translation, supports regional and national innovation, and delivers sustainable impact for industry, government, and the broader community.

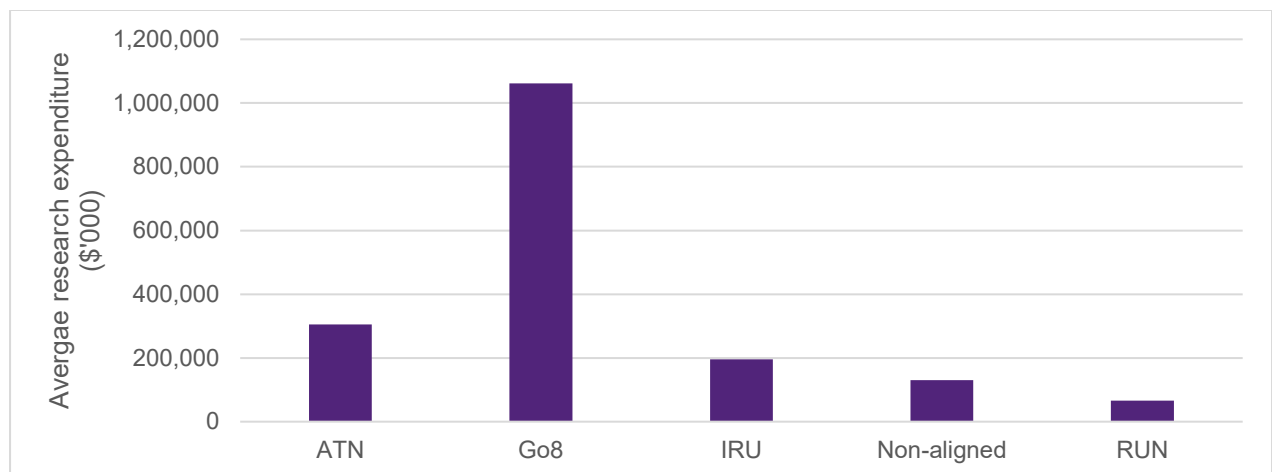
Recommendation

ATEC and the Department should contextualise any regulatory changes enabling research specialisation within a broader strategy for a differentiated and connected higher education research system. This strategy should define how institutions operating at different scales can work together to support research quality, depth and sustainability, while also respecting institutional autonomy and distinct missions.

Figures 1 and 2 present high-level research metrics that demonstrate the different scales of operation across the sector. They show research expenditure for the most recent year available, 2022, and Research Block Grant allocations for 2026. If institutions not yet registered as universities are included, four broad groupings could be considered in developing this more comprehensive approach:

1. Research-intensive universities
2. Mid-scale research-active universities, including institutions in the Innovative Research Universities and Australian Technology Network groupings, together with non-aligned institutions of a similar scale
3. Specialised and regional universities, including institutions in the Regional Universities Network
4. Pipeline organisations seeking registration in the Australian University category

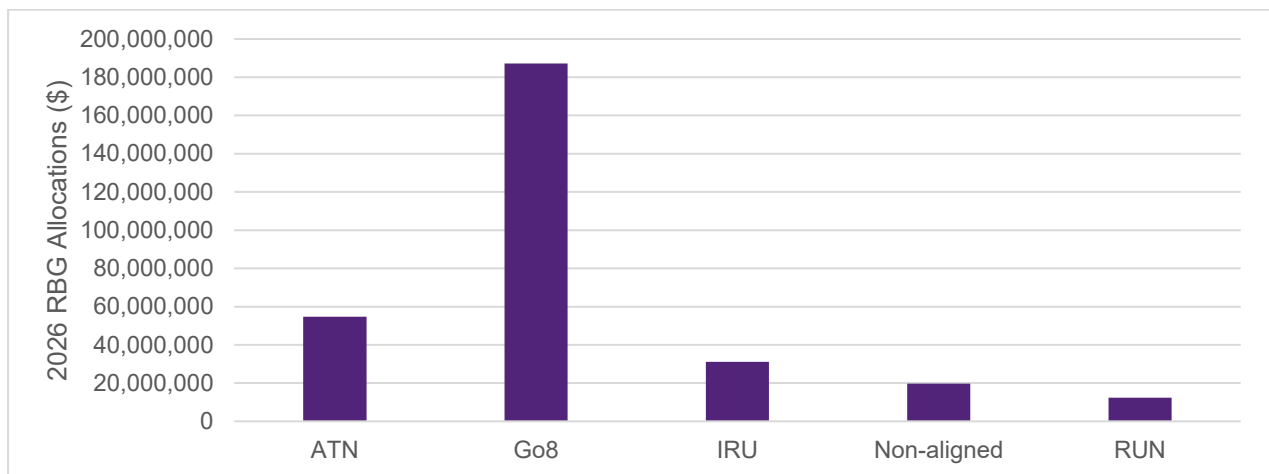
Figure 1. Average research expenditure by higher education cohort in 2022 (the most recent year for which the data are available).



Source: Higher education expenditure on R&D by higher education provider time series, Department of Education (2024).

<https://www.education.gov.au/research-block-grants/resources/higher-education-expenditure-rd-higher-education-provider>

Figure 2. Average 2026 research block grant allocations by higher education cohort.



Source: 2026 Research Block Grant Allocations, Department of Education (2026). <https://www.education.gov.au/research-block-grants/resources/2026-research-block-grant-allocations>

The substantial differences in scale across these groupings reinforce the need for a system-wide approach. Research depth and sustainability cannot be considered independently of the resources, infrastructure and partnerships available to institutions. A networked model would provide a basis for supporting institutional specialisation while maintaining capability and quality across the sector.

Types of research activity

Another element not considered in detail in the consultation paper is the type of research activity in which a university might specialise. UQ acknowledges that the current TEQSA Threshold Standards frame research standing in relation to Fields of Research. However, there may also be value in considering whether universities operate in, and could specialise in, types of research activity, including discovery, applied or mission-driven and translational research, noting that these are overlapping categories.

Consideration could be given to how Australia can achieve research excellence across the pathway from discovery to translation, including at the interface between disciplines and underpinned by disciplinary excellence. For example, a regional university may develop particular strength in applied research that responds to local industry, community and government needs. Interdisciplinary approaches may be critical to this work, and the way in which research excellence is demonstrated may differ from approaches based primarily on citation metrics.

Recommendation

ATEC should consider how a specialised model could recognise different types of research activity, as well as Fields of Research, and how excellence can be demonstrated appropriately across discovery, applied, mission-driven, translational and interdisciplinary research.

2.2 What safeguards are needed to ensure a more specialised research model continues to support research quality, scholarship, teaching and learning, student outcomes and institutional maturity?

National research framework

The sector lacks a shared national framework to inform what constitutes world standard research, how it should be evidenced and the extent to which Australia has the depth and breadth of capability required for the future.

Development of the framework should be informed by the recent Strategic Examination of Research and Development report and broad consultation with universities, disciplines, research funders, industry and other users of research. The framework should be transparent, proportionate and capable of recognising excellence across research types and disciplines. It should also leverage existing data collections and processes where possible to avoid further administrative burden.

Changes to the Threshold Standards should occur only after a credible national research framework has been established and tested.

Recommendation

The Australian Government should establish and test a credible national research framework before amending the Threshold Standards. The framework should be informed by broad and appropriate consultation and recognise research contributions across disciplines and beyond citation-based measures.

Teaching and research workforce nexus

Consideration should also be given to the effects of research specialisation on the teaching and research activities that universities of different sizes and in different geographic locations can sustain. There is a strong connection between the research and teaching workforce in Australian universities. While few institutions can afford to maintain large cohorts of research-focused staff, the contribution of research strengths to teaching quality, and of teaching to research quality, is widely recognised. Across the sector, including in research-intensive universities, institutions are seeking to increase the teaching contribution of research-focused academic staff in recognition of this connection, while improving efficiency and quality and reducing reliance on casual teaching.

There are several important implications that require further consideration.

First, there are important student equity implications. If the academic workforce at a university becomes less disciplinarily diverse, particularly in regional areas, the courses available to students may also become more constrained. Although the consultation paper refers to examples of specialisation in Europe and the United States, Australia's geography and population distribution create different challenges. Moving between Stuttgart and Munich to access a preferred course is materially different from moving between Perth and Sydney.

ATEC should therefore consider whether additional support may be required for students who wish to study in priority areas but cannot do so without relocating a significant distance.

Second, the consultation paper suggests that the specialised model may support a greater concentration of expertise. However, maintaining academic staff beyond those required to deliver teaching may not be financially sustainable for smaller institutions. Recent reductions in international student income are likely to intensify this pressure. The proposed reduction in fellowships under the revised ARC-administered National Competitive Grants Program may

create further challenges for institutions seeking to maintain research-focused academic capability.

Recommendation

Safeguards should address the effects of research specialisation on disciplinary workforce diversity, the range of courses available to students and equitable access to study, particularly in regional areas. They should also recognise the financial constraints that may limit the capacity of smaller institutions to maintain research-focused academic workforces.

2.3 How should regulatory settings be designed to enable greater research specialisation while maintaining confidence in the Australian University category?

UQ considers that detailed regulatory settings should not be developed until the broader strategic model for research specialisation has been established. As outlined in the preceding responses, this model should clarify how a differentiated and connected higher education research system would operate and how research quality would be maintained across institutions with different missions, scales and areas of focus.

In particular, regulatory reform should be informed by:

- a credible national research framework that has been established and tested; and
- consideration of excellence across types of research activity, as well as Fields of Research, including how excellence can be evidenced appropriately in each context.

These foundations are necessary to ensure that any revised standards are clear, credible and capable of consistent application. They would also help maintain confidence that greater flexibility for institutional specialisation does not lower the research expectations associated with the Australian University category.

Recommendation

Regulatory settings for research specialisation should be developed only after the broader strategic model has been established. They should recognise excellence across types of research activity as well as Fields of Research.

2.4 What institutional, regulatory or system-level risks could arise during implementation, and how could these be mitigated through regulatory design, transition arrangements, guidance or monitoring?

As outlined above, moving from a predominantly independent model towards a more networked approach could enable some implementation risks to be managed collaboratively. Shared resources and the scale of research-intensive universities, together with cooperative arrangements among smaller institutions pursuing specialisation, could help maintain research capability and standards across the system.

These arrangements could include a degree of shared capability in research ethics and integrity, library and repository services, research infrastructure and research systems. Such collaboration could reduce duplication, improve efficiency, sustain world-class facilities and help institutions access capabilities that may be difficult to maintain independently.

Universities already work together successfully to share infrastructure and other high-cost research enablers, including through the National Collaborative Research Infrastructure Strategy. Government and ATEC should facilitate regulatory and funding settings that provide universities with autonomy to select the appropriate balance between comprehensive scope

and specialisation. These settings should enable research excellence, appropriate teaching breadth and interdisciplinary research capability, while supporting efficient resource sharing and high standards of research management and conduct through collaboration.

Recommendation

Implementation settings should enable and encourage collaborative approaches to research capability, including shared access to infrastructure, systems, expertise and research support services.

Appropriate funding mechanisms will also be needed to meet the costs associated with maintaining research capability. These costs include the indirect costs of research. As identified throughout the Australian Universities Accord and Strategic Examination of Research and Development processes, Research Block Grant funding has not kept pace with the growing indirect costs faced by the university research sector.

Collaboration and shared capability can improve efficiency, but they do not remove the cost of maintaining research infrastructure, integrity systems, specialist workforces and other essential research enablers. Maintaining excellence across the sector will require the true cost of research to be addressed.

Recommendation

Reform should be supported by sustainable funding arrangements that recognise the direct and indirect costs of maintaining research excellence, including infrastructure, governance, integrity systems and specialist capability.

2.5 What transition arrangements, implementation timeframes and grandfathering provisions, if any, should apply to existing Australian Universities, Australian Universities with a specialised focus, prospective applicants and providers currently progressing under existing transitional arrangements?

Changes to regulatory settings should be staged carefully and should not create unnecessary reporting or administrative burden, particularly for universities that do not elect to pursue a specialised model.

Transition arrangements should recognise the long lead times required to change institutional research strategies, staffing and infrastructure. Implementation should follow the establishment of the broader strategic model and a credible national research framework that has been established and tested. Existing universities that continue to meet current category requirements should not be required to undergo unnecessary reassessment.

Recommendation

Implementation should be staged and proportionate, with appropriate grandfathering, clear transitional pathways and minimal additional burden for institutions that do not elect to specialise.

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