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Association of Australian
Medical Research Institutes

SUBMISSION

**AUSTRALIAN RESEARCH COUNCIL
AMENDMENT (ENSURING RESEARCH
INDEPENDENCE) BILL 2018**

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Australian Research Council Amendment (Ensuring Research Independence) Bill 2018

1 About AAMRI

The Association of Australian Medical Research Institutes (AAMRI) is the peak body for medical research institutes (MRIs) across Australia. Our 58 member organisations work on a broad spectrum of human health issues such as preventive health, chronic disease, mental health, immunology, and Indigenous health. Their research ranges from fundamental biomedical discovery through to clinical research and the translation of research findings. Researchers at medical research institutes undertake a wide range of investigator-led research funded by the National Health and Medical Research Council, and in conjunction with colleagues at universities, research funded by the Australian Research Council.

2 Summary of submission

- AAMRI is a strong supporter of expert reviews being used to determine the relative strength of Australian research council funding applications.
- Expert reviews ensure that public funding is only invested in outstanding world-class research.
- The value of research needs to be considered by the economic, social, cultural and health benefits it delivers to the nation.
- Research proposals should be assessed by subject experts using transparent and rigorous criteria.
- It is unreasonable to shift the goalposts by introducing new assessment criteria after application rounds have been completed.
- The increased use of ministerial vetoes undermines the expert review process.

3 The benefits of investing in investigator-led research

Of the Australian Government's annual \$12 billion investment in science, research, and innovation about \$1.7 billion is directed towards the Australian Research Council (ARC) and the National Health and Medical Research Council (NHMRC)ⁱ. This investment through the research councils is the primary way the government supports investigator-led research. This type of research sees researchers putting forward their own ideas for research projects which have potential to deliver new and novel research findings. Investigator-led research, particularly in early-stage discovery research, is the engine room of the research system. It is here where amazing new ideas and discoveries are made which are then used to transform the world around us.

There are countless examples of where Australian investigator-led curiosity-driven research has made a substantial positive impact on Australia. The development of the cochlear implant, the artificial heart valve, IVF treatment, understanding the role of antibodies in the immune system, and the discovery that the bacteria, *Helicobacter pylori*, leads to gastritis and peptic ulcers. It is this 14% of the Australian Government's annual investment in science, research and innovation budget that powers the remaining \$10.3 billion of investment made by the government, as well as private sector investment too.

4 Ensuring the best returns from research investment

These developments and discoveries have only been made possible by allowing the best and brightest minds to put forward research proposals and then assess their merits through a rigorous and tough assessment process. Public funding for research is a precious investment that must always be made wisely. With only a finite amount of funding available each year decisions must be taken on where to target investment to ensure the greatest possible returns. This includes the potential economic, social, cultural and health benefits research can deliver.

Across the world leading research nations have recognised the most effective way to determine which investigator-led research to invest in is to use a merit-based system. This approach sees applications go through a tough and rigorous expert review assessment process. In Australia this process is especially tough given the relative low levels of funding available results in around 80 to 90 per cent of applications being rejected by the ARC and NHMRC.

The process used in Australia to determine which applications to fund and which to reject is like that used in other world-class research nations. Independent experts are tasked with reviewing and making assessments of funding applications (expert review)ⁱⁱ. These are assessments made by other researchers that have the substantial training and expertise required to review what can be highly technical and complex funding applications. The assessment is made against rigorous criteria that has been set out by the funding body in agreement with the government. These criteria cover a range of areas including feasibility of the proposed research as well as benefit to the population.

5 Overriding expert review weakens proven quality assurance processes

In recent years the Australian Government has modified the effective expert review processes for ARC grant programs by adding new undefined assessment criteria after the application process has been completed. It has also vetoed research applications that are not in line with changing government expectations. This has seen applications that have been recommended for funding by subject-based experts subsequently rejected by the Minister for Education. Overriding expert review and rejecting applications on unclear and shifting grounds reduces rather than enhances the effectiveness of the expert review process.

The following two sections of the submission explore the form this intervention has taken and its impact on the research application process.

6 Shifting the goalposts – introducing new assessment criteria after application rounds have been completed

In 2018 it was revealed that 11 ARC grants had been vetoed. The reasons for the veto were not clear but appeared to be related to the then Minister not accepting there was value for money in those applications. These were research funding applications that had been developed in response to the funding rules that had set by the Education Minister, funding rules that did not mention a value for money criterion would be applied by the Minister.

Following this, the government instructed the ARC to require future applicants to put forward a national interest statement as part of the assessment process. Despite demonstrating to expert and trained reviewers that their research was in the national interest, in 2021 the

Minister overrode the recommended funding applications of six applicants. This time the Minister did so again on newly introduced criteria that had not been included in the program funding rules. These are funding rules previously set by the Education Minister. The reason stated for the veto was that the research 'did not represent value for money to the Australian tax-payer'.ⁱⁱⁱ

Introducing new assessment criteria at the end of an application process and not providing applicants with the ability to respond erodes Australia's reputation as a world-class research nation. It is unreasonable to shift the goal posts at the last minute following an arduous 12-month process. If the government wishes to employ value for money as part of the application process, which it has the right to do so, it would be fairer to do so at the start of the process and to set out just what the 'national interest' and 'value for money' criteria are, and how they will be applied. Furthermore, it is those with expertise who have read the full research proposal that are best placed to make such a judgement.

7 Ministerial vetoes of grants recommended for funding

The broader issue of overriding expert assessment of grant applications is highly unusual in the history of Australian research, as well as in other advanced research nations. Allowing an avenue for Ministerial intervention runs the risk of future governments politicising the research grant process. If such interventions in the grant process become more routine, it is inevitable that researchers will start to factor this into their decision-making process. This could see researchers modifying their grants according to what they felt the government or minister of the day viewed as worthy research.

This outcome would be unfortunate as what a particular government, or even a particular minister, sees as valuable research will vary and the long-term critical research needs of the nation might not be effectively met. Outstanding research could be vetoed as the researcher, or its subject area was not in favour with the government of the day.

8 Ensuring Australia is an attractive place to undertake research

Australia has been an attractive research destination for many of the world's top researchers because of its meritocratic research funding systems. Processes for determining where to make research investments have been clear, fair, transparent, and rigorous. The changes in recent years in how ARC research funding investments are made, such as through Ministerial national interest and value for money assessments and the use of Ministerial funding vetoes, could undermine this reputation. To be an attractive place to do research Australia needs clear and transparent processes for assessments that do not shift according to values of the Minister of the day.

ⁱ Department of Industry, Science, Energy and Resources (2021) *Science, Research and Innovation (SRI) Budget Tables*. Available at: <https://www.industry.gov.au/data-and-publications/science-research-and-innovation-sri-budget-tables>

ⁱⁱ Often referred to as peer review.

ⁱⁱⁱ InnovationAus (2021) *Minister rejects six peer-reviewed ARC research grants on 'national interest' grounds*. Available at: <https://www.innovationaus.com/minister-rejects-six-peer-reviewed-arc-research-grants-on-national-interest-grounds/>