

Submission to the ATEC Consultation on Research Specialisation ATN Universities

7 September 2026

THE KEY MESSAGE FROM ATN UNIVERSITIES

1. ATN Universities welcomes ATEC implementing SERD's recommendation to enable research specialisation; our members already lead the way, holding two of the six Trailblazer hubs and partnering in a third.
2. The reform must make specialisation genuinely optional: no funding advantage or penalty for nominated or non-nominated fields, and no requirement to publish or compete on the nomination.
3. Universities also need a research training capacity floor across their full teaching profile, so specialisation in some fields never comes at the cost of research-informed teaching in others.

ATN member universities lead research that delivers real-world impact across disciplinary lines, and specialisation may benefit their missions

4. The Australian Technology Network of Universities (ATN Universities) represents Australia's most applied, industry-connected universities: Curtin University, Deakin University, the University of Newcastle, RMIT University and the University of Technology Sydney. ATN member universities are a leading component of Australia's applied research system, with a strong track record of delivering real-world impact for the Australian community and economy. ATN member universities specialise in translating world-class research into increased productivity, new products and better services. Our industry-engaged and multidisciplinary research programs span fields like renewable energy, critical minerals, and advanced manufacturing, as well as critical social science research that directly addresses productivity, resilience and fairness in Australia.
5. ATN members demonstrate a strong industry partnership model. The Department of Education's Trailblazer Universities Program leveraged public money to draw further private investment into commercialisation and research capability, and ATN member universities' applied, industry-connected missions allow us to multiply that impact.
6. Curtin University's Trailblazer hub illustrates how specialisation can strengthen rather than narrow a university's broader capabilities. Its Critical Minerals Trailblazer built on existing strengths in the WA School of Mines, ranked among the world's top five for Mineral and Mining Engineering, and leveraged longstanding industry expertise in metallurgy, rare earths and mineral processing. Its commercialisation activity sits within Curtin Venture Studio, while its research connects with the Curtin Institute for Energy Transition.
7. The result is that specialisation has not narrowed Curtin's research base. Instead, it has deepened an existing area of strength while creating industry relationships, commercialisation capability and research infrastructure that can benefit the broader institution.

Supporting universities to voluntarily specialise is in the public interest

8. ATN Universities supports allowing universities to voluntarily choose specialisation. ATN's mission is advocating for productivity, resilience and fairness in Australian society and our economy; a diverse university sector supports those aims. Current regulatory settings can encourage universities to maintain research

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breadth across fields regardless of each institution's mission. This constrains universities' ability to direct their own resources, in the way each judges best for their mission.

9. ATN Universities supports moving to a model that enables specialisation. Getting the detail right matters as much as the direction of travel. The recommendation below sets out the conditions needed to ensure any move to specialisation is genuinely voluntary, and strengthens, rather than undermines, university autonomy and institutional mission.
10. ATEC is already exploring how to support universities to pursue specialised research goals. Mission based compacts (MBCs), the first round of which are currently being finalised, are intended to support pursuit of universities' individual missions. Work to change regulatory settings around research requirements should keep MBC processes in context.

Genuine choice means treating specialisation and breadth as equally legitimate strategic paths

11. The SERD report found that the broad requirement for excellent research in varied fields could be preventing institutions from choosing specialisation, and recommended allowing focus on particular areas.¹ This framing rightly implies that universities should be supported to pursue *voluntary* specialisation depending on their mission, strategy and local context. ATEC's Consultation Paper touches on this voluntary component, but any changes need to put this baseline requirement at the front and centre.
12. Voluntary has to mean voluntary in both directions. Many ATN member universities will choose to specialise where they have clear strength and industry demand, as Curtin has in critical minerals. Others may judge that maintaining excellent research across a wider breadth of disciplines better serves their mission and their region, or that the challenges facing Australia require a multidisciplinary and dynamic stance rather than a traditional approach based on discrete academic fields of research. ATEC's amended Threshold Standards should make both paths equally legitimate, so the decision reflects each university's own strategy rather than a new implicit expectation to specialise.

Recommendation 1

13. Two conditions supporting genuinely voluntary adoption should be written into ATEC's advice on the amended Threshold Standards:
 - 13.1. nominated FoRs are formally decoupled from funding assessment so that choosing to specialise carries no funding advantage or penalty relative to not specialising; and
 - 13.2. the nomination is not published or used as a competitive or category signal, so a university can revise its nominated fields over time as its strategy evolves, without being locked in by outdated regulatory or reputational expectations.

¹ SERD Report Recommendation 3: *Allow universities to achieve research specialisation by reforming registration requirements to reduce the condition for research breadth and enable each to build scale in areas of their competitive and comparative advantage.*

Research training needs to be delivered in an environment of research activity

14. Research training that is delivered in non-nominated fields still needs to be delivered in an environment of research activity. Specialisation of research in some fields should not devalue research training in other fields. As well as directly contributing to research training, researchers play a critical role in informing the development of curriculum and teaching in a discipline.
15. Universities often make the legitimate strategic choice to maintain research activity in a range of fields in order to support the quality of teaching and curriculum design in those fields. This is a feature that remains core to the Australian university model, as upheld in the Coaldrake Review that the ATEC Consultation Paper cites.

Recommendation 2

16. A research training capacity floor should apply across the full teaching profile regardless of nominated depth, possibly expressed as demonstrated HDR supervision capacity. This would enable research students to be connected to the research community and to help retain the benefits of the research-teaching nexus which is core to the Australian university model.

We welcome further discussion with ATEC and the Government about how we can support a diverse and flexible university sector, where institutions can pursue their mission in the public interest.

Further enquiries should be addressed to:

Dr Andy Marks
Executive Director
Australian Technology Network of Universities
info@atn.edu.au
CC: Nikini Weragoda | nikini.weragoda@atn.edu.au

Note: comments at a technical level that highlight other challenges ATEC needs to address can be found in the technical appendix to this submission.

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Technical Appendix

A1. ATEC's Consultation Paper asks a number of technical questions which raise contextual issues.

Even voluntary research specialisation can impact on the ability to fund research across other disciplines

- A2. The key risk of a voluntary but continually reinforced track towards specialisation is that voluntariness does not protect against the self-identification effect. Publicly nominated FoRs risk declaring that other FoRs are non-priority, and competitive funders, industry partners, HDR applicants and rankings will read that signal regardless of what the Standards say.
- A3. ATN Universities understands the Government's commitment to reform in the direction of allowing specialisation. Universities of different kinds should be enabled to pursue their research mission without arbitrary distortion by regulatory settings. ATEC must emphasise while it undertakes this work that university choices to shift focus between FoRs do *not* mean research in other fields is therefore less promising.

4-digit FoRs are far narrower than 2-digit FoEs, which ATEC needs to take into account

- A4. There are 12 FoEs at 2-digit level, and 213 FoRs at 4-digit level. A switch from FoEs to FoRs is more significant than the Consultation Paper suggests. While the Consultation Paper phrases this as a continuity, 3 out of 213 is a far lower bar than the current standard.

4-digit FoRs don't map to the issues-based national priorities identified by the Commonwealth and others

- A5. ATN member universities have a range of research programs in Australia's identified critical fields. These do not align neatly to 4-digit FoRs. For example, a renewable energy multidisciplinary research project may involve electrical engineering, regional demography, policy studies and ecology.

Risks of unintended consequences

Redirection and concentration of research funding

- A6. Further specialisation may build some institutions as research "powerhouses" and reduce others to being teaching focused. This could lead to a redirection of research funding to traditional research institutions at the expense of investment across a more diverse set of institutions with differentiated missions that target the needs of regions, industries and communities across the country.

Misalignment with priorities for maintaining and expanding research training

- A7. As part of the mission based compacts process, ATEC expressed interest in ensuring domestic PhD student numbers do not decline. If moves to research specialisation result in fewer opportunities for researchers to take on doctoral students in non-nominated fields, this could impact the research system's total capacity for research training. ATEC should consider possible consequences of research specialisation for domestic PhD candidate numbers.
- A8. Revising the provider category standards to allow for research specialisation may see more institutions being classified as an Australian University in an environment where Commonwealth Supported Places

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funding is limited, unless expectations for research depth in a specialised model are set materially higher, as the Consultation Paper contemplates.

Changes to the HES Framework without the evaluation regime that would assess compliance raise risks that the evaluation regime would not be aligned

- A9. The *Tertiary Education Quality and Standards Agency (Quality of Research) Determination 2021* already requires TEQSA to have regard to results from Excellence in Research for Australia and the Engagement and Impact Assessment or any successor evaluations, and defines Engagement and Impact Assessment as researchers' engagement with end-users and translation into economic, social, environmental, cultural and other impacts. Both evaluations have been discontinued and no successor is operating.
- A10. ARC's Research Insights Capability is under development and its timing bears on whether amendments proceed before, alongside or after national evaluation is settled. ATEC, TEQSA and ARC should consult closely to ensure that there is a coordinated understanding of what evaluation regimes are available and how they are applied to actual assessments of university category standards.

ATEC needs to include a range of metrics beyond the traditional metrics named in the Consultation Paper to allow for the diverse range of forms that university research can take

- A11. ATEC asks how "depth" should be operationalised. The strengths of applied universities sit in translation, industry co-investment, end user impact, and problem-focused work that spans FoR boundaries rather than concentrating within one. Operationalisation through publication and citation-weighted world-standard assessment within discrete 4-digit fields of research would disadvantage applied universities with multidisciplinary and end user focused projects.
- A12. ATEC should review international precedent in support of using an appropriate range and mix of metrics, such as: the United Kingdom's *Knowledge Exchange Framework* as well as the *Research Excellence Framework 2029*, and the *Netherlands Strategy Evaluation Protocol*.