Fowl or Fish? A submission to the ACIAR Review

Robin Davies and Stephen Howes

Development Policy Centre, Crawford School of Public Policy, Australian National University

ACIAR is a very important organization. It is the only aid agency in Australia which has legislative backing, something the much bigger AusAID lacks. More importantly, although its funding consists of only a small part of the Australian aid program, it is one of the largest funders of agricultural research for development in the world. It is difficult to get a precise estimate of global Official Development Assistance (ODA) for this purpose but a reasonable estimate would be around $US920 million dollars per annum, of which $US700 million is accounted for by the 15 member agencies of the Consultative Group on International Agricultural Research (CGIAR). In 2012-13, ACIAR will manage around $US120 million, or about 13 per cent of global ODA in support of agricultural research for development, with funding more than 50 per cent greater than that of the largest CGIAR agency. Compare this to the 3-4 per cent which is Australia’s share of global ODA for all purposes, and the importance of ACIAR is apparent.

1 Stephen Howes is a Professor of Economics at the Crawford School and Director of the ANU’s Development Policy Centre. Robin Davies is a Visiting Fellow at the Development Policy Centre. Both have held senior positions with AusAID.

2 There are no good data on the use of ODA for agricultural research for development. DAC statistics give the aggregate funding level in 2010 as $US416 million, which is clearly a significant underestimate given that donor funding for the CGIAR system in the same year was almost $US700 million. In all likelihood, not a great deal more than $US700 million is spent on agricultural research for development, as funding for national research institutes in developing countries is certainly quite low and there are few centres in developed countries, other than ACIAR and some of the CGIAR agencies, that conduct ODA-funded international agricultural research. A reasonable estimate is that total ODA funding for agricultural research is about $US920 million, comprising $US700 million for the CGIAR system (including approximately $US40 million from AusAID and ACIAR), up to $US100 million for all other non-ACIAR agricultural research for development globally (essentially a guess but likely to be a generous one), and net ACIAR funding of about $US120 million (excluding ACIAR funding that is passed through to the CGIAR system, which in 2012-13 is $A14 million). ACIAR’s net funding of about $US120 million thus constitutes 13 per cent of a global funding total of about $US920 million.

3 The two largest CGIAR agencies by 2011 revenue are the International Food Policy Research Institute and the International Maize and Wheat Improvement Centre (CYMMIT), at $US81.7 and $US81.6 million respectively. Data
Given this, and the length of time since the last review of ACIAR, we welcome the present review, and its wide-ranging terms of reference which call on the review panel to examine ACIAR’s “appropriateness, effectiveness and efficiency.” We also welcome the opportunity to make a submission. This is not an exhaustive submission. Our focus is on the following seven issues, on each of which we make one recommendation to the panel.

1. **ACIAR’s objective**

2. **ACIAR’s role in funding and engaging with the CGIAR system**

3. **ACIAR’s role in implementing development projects**

4. **ACIAR’s approach to sourcing expertise**

5. **The geographical distribution of ACIAR’s activities**

6. **Impact evaluations of ACIAR’s research programs**

7. **The Australian International Food Security Centre**

8. **The 2011-12 Strategic Framework Panel**

1. ACIAR’s objective

ACIAR does not have and has never had an explicit statement of objective defined for it in government policy. The broader Australian aid program has always had such an objective, which was most recently revised in response to the 2010 Independent Review of Aid Effectiveness. The latter is not legislated but stands as a clear statement of the Government’s expectations of the aid program and of the agencies responsible for its delivery. ACIAR has instead a legislated statement of “functions”, which are in fact set out as functions of its CEO. The functions defined are broad – primarily the identification of agricultural problems affecting developing countries and of solutions to them – and are articulated without reference to the objectives or indeed the existence of Australia’s overseas aid program, except that there is a stipulation that the Director General of AusAID should be a member of ACIAR’s Policy Advisory Council.

ACIAR’s own account of its objective, as currently articulated on its web site, does make reference to the aid program: “[ACIAR] encourages Australia’s agricultural scientists to use their skills for the benefit of developing countries and Australia. ACIAR funds research projects that are developed within a framework reflecting the priorities of Australia’s aid program and national research strengths, together with the agricultural research and development priorities of partner countries.” There are three problems with this informal statement of objective.

First, it incorporates a mutual-benefits rationale and restricts funding to Australian sources of expertise. Neither of these elements corresponds to anything in ACIAR’s legislated statement of functions, which contains no mention of benefits to Australia, direct or indirect, or exclusive reliance on Australian expertise. There is no doubt that the intention that ACIAR should harness Australian expertise was behind its establishment. The (1981) second reading speech of the Minister for Foreign Affairs of

\[\text{Australian Centre for International Agricultural Research Act 1982.}\]
\[\text{This role is now delegated to an AusAID rural development specialist. The Director General of AusAID is a member of the higher-level ACIAR Commission.}\]
\[\text{http://aciar.gov.au/aboutus}\]
the day, Tony Street, is clear about this. However, it makes only a very oblique reference to benefits for Australia. The speech is worth quoting on this point in full:

While its primary purpose is to assist developing countries, Australia too will gain in the following ways: Enhanced contact between our agricultural scientists and their overseas colleagues; the increased information Australia will have at its disposal on the agricultural problems of developing countries; by strengthening the links between Australian and overseas scientists and institutions; and, finally, some of the solutions the research sponsored by the Centre produces will be of direct and practical benefit to Australia, even though that may not have been the original intention.

Second, the objective as currently formulated conveys no sense of complementarity: it establishes no specific niche for ACIAR that would assist in determining whether a particular activity or strategy were likely to meet a need that could or would not be met more effectively or efficiently by another agency, including any of the 15 CGIAR agencies. Elements of ACIAR's current research programs are in areas covered by, and engage researchers who are also funded by, CGIAR agencies. Forestry research, for example, is undertaken by both ACIAR and the Bogor-based Centre for International Forestry Research, and the latter organisation frequently engages Australian researchers who also receive funding from ACIAR.

And third, the objective ignores significant functions defined in ACIAR's Act: “to conduct and fund development activities related to [its] research programs” and “to fund international agricultural research centres”. The first of these two functions was added by legislative amendment7 in 1992, following the “sunset” review of ACIAR conducted by the Joint Standing Committee on Foreign Affairs, Defence and Trade.

The absence of a formal statement of ACIAR’s overarching objective is problematic. It has allowed a situation to develop where ACIAR's activities, uniquely among activities

supported by the Australian aid program, are routinely justified on the basis of mutual-benefits considerations.\(^8\) It has contributed to a lack of clarity about exactly what kind of organisation ACIAR is intended to be – is it a domestic research funding council whose field is international agricultural development, or a species of development organisation capable of operating all along the research-and-development spectrum and leading Australia’s engagement with the CGIAR system? (Is it, in the terms of our title, fowl or fish?) And it has obscured the question whether some elements of ACIAR’s work might not be carried out more effectively and efficiently by CGIAR agencies that Australia also funds, via both ACIAR and AusAID.

It also seems to be the case that the narrative used to describe ACIAR’s aims and activities represents a frozen view of the role of the aid program. Since ACIAR’s creation, much of the aid program, once tied to purchases from Australia, has been untied. The commercial objective of the aid program was explicitly removed by Minister Downer in the late 1990s, and over time the national interest benefits of the aid program have been downplayed.\(^9\) Given that ACIAR’s current practices of tying its aid to Australian researchers and justifying its results in terms of mutual benefits are not required by legislation, the question must be asked whether ACIAR should not be brought into line with the rest of the aid program.

\(^8\) The Chubb report of 2011, *Strategic Framework for International Agricultural Research within Australia’s Aid Program*, contains much on the importance of “two-way flows” of expertise, and states that “It is in Australia’s interests to broaden research partnerships with countries such as China and India, even as these countries emerge from bilateral aid relationships. Such scientific cooperation delivers direct benefits to Australian agriculture.”

\(^9\) Australia is in the process of phasing out most forms of aid to China and India. AusAID has not listed assistance through ACIAR among the small number of forms of ongoing assistance (http://www.ausaid.gov.au/countries/eastasia/china/Pages/home.aspx).

The 1984 Jackson Report on the program proposed three main objectives: humanitarian, diplomatic and commercial. These formed the basis of aid policy until 1997. In response to the 1997 Simons Review, the government adopted the following objective: “Advancing Australia’s national interest by assisting developing countries to reduce poverty and achieve sustainable development.” Following the 2006 White Paper, *Australian Aid: Promoting Growth and Stability*, the objective was changed to this formulation: “To assist developing countries to reduce poverty and achieve sustainable development in line with Australia’s national interest.” Finally, following the Independent Review of Aid Effectiveness, the objective was rearticulated as follows: “The fundamental purpose of Australian aid is to help people overcome poverty. This also serves Australia’s national interests by promoting stability and prosperity both in our region and beyond. We focus our resources and effort where Australia can make a real difference and where our resources can be most effectively and efficiently be deployed.” The progressive downplaying of the role first of commercial and then of national interests is evident from these successive reformulations.
Indeed, it can be convincingly argued that ACIAR has not utilized the flexibility provided by its legislation. The best way in which to identify and solve the agricultural problems of developing countries (the essence of what ACIAR's legislation requires it do) might change over time. While the aid program has moved over time, ACIAR has, this flexibility notwithstanding, been left behind.

While it seems clear to us that the commercial benefits to Australia should receive less or no weight, there might be arguments for continuing to tie our aid to Australian researchers. After all much, though not all, research and scholarship support from the Australian aid program is still tied to Australian institutions. However, there might equally be a case for looking outward – allowing or encouraging ACIAR to seek out the best researchers wherever they are, rather than the best Australian researchers. For example, ACIAR might open a competitive funding window (see below) which would be available to researchers worldwide. Or it might create incentives for Australian researchers to partner with other developed- and developing-country researchers.

Were ACIAR to move in this direction, as we think it should, the point made above about clarifying its niche in the global architecture of agricultural research for development agencies would become even more imperative.

- **Recommendation 1.** The review should consider not only the appropriateness of ACIAR’s self-generated “goals and strategies in supporting the fundamental purpose of Australian aid” but also recommend an overarching goal for ACIAR’s work, to be adopted as Government policy after whole-of-Government consideration, which would provide full consistency with the existing goal of Australia’s aid program. The focus should be on development benefits, not mutual benefits. The approach should be to address needs addressed as important to Australia’s aid objectives that are not adequately addressed by other mechanisms. Those needs might well be defined in such a way that Australian sources of expertise are highly relevant, but consideration should be giving to moving in the direction of untying ACIAR funding so that it can do more to draw on the world’s best researchers, wherever they are.
2. ACIAR’s role in funding and engaging with the CGIAR system

The current situation, where ACIAR channels core funding to the CGIAR system and AusAID increasingly provides special-purpose grants to individual CGIAR agencies, including in recent years the International Rice Research Institute, the Global Crop Diversity Trust and the Centre for International Forestry Research, is not satisfactory. In part, it clearly reflects a view within AusAID that certain Australian Government priorities are not being well-served by the level of funding channelled through ACIAR. That, in turn, might well reflect the conflict of interest inherent in making an organisation that in some respects competes with CGIAR agencies for both turf and researchers responsible for determining the level of funding that will be passed through to the CGIAR system.

There would seem to be a good *prima facie* case for the total level of funding for the CGIAR system to be determined by the Minister for Foreign Affairs on advice from AusAID and ACIAR, which might well involve some contestation, and for ACIAR to be responsible for engagement with the CGIAR system on essentially all core and non-core funding once allocated. It is doubtful, however, that ACIAR could discharge this responsibility under its current organisational arrangements, which do not appear to give high priority to multilateral engagement.

The Chubb report of 2011, which is essentially an ACIAR policy statement, argued in favour of greater engagement with the CGIAR system. However, it was envisaged this would take the form of additional support, though ACIAR, for Australian participation in the newly-established CGIAR Research Programs. It is not evident that such support is required as many Australian researchers – some of whom, as noted above, regularly also receive research funding from ACIAR – are already likely to become heavily engaged in such programs without the mediation of ACIAR. The situation here is analogous to that which is about to obtain with respect to ODA funding for medical research for development: the Government has indicated a portion of the new funding to be allocated for this purpose will be allocated to Australian researchers via the National Health and Medical Research Council (NHMRC) to enhance their participation.
in international medical research initiatives, even though NHMRC mediation is entirely unnecessary.

- **Recommendation 2.** The review should consider carefully the budgetary process leading to decisions on the allocation of resources to the CGIAR system vis-à-vis ACIAR, with a view to proposing arrangements that avoid conflict of interest and ensure stable and sufficient funding for the needs of both ACIAR and the CGIAR agencies. In addition, the review should examine the adequacy of ACIAR’s current organisational arrangements for engagement with the CGIAR system.

3. **ACIAR’s role in implementing development projects**

As noted above, one of ACIAR’s legislated functions is to conduct and fund development activities related to its research programs. ACIAR does from time to time accept responsibility for the management, or partial management, of AusAID-funded rural development programs with a significant research and development element, including programs in Indonesia, Cambodia and Pakistan. However, this legislated function appears to reflect a view on the part of those who introduced it by legislative amendment in 1992 that ACIAR needed, not a capacity to implement AusAID projects, but rather an internal capacity to complement its research and development work with activities aimed at ensuring the adoption of promising technologies and techniques.

While designing and funding such adoption activities has long been seen as AusAID’s role in principle, successive reviews of ACIAR have noted the very limited support that has been provided by AusAID, or for that matter sought by ACIAR, for such activities. This has been a stubbornly persistent problem which is very unlikely to be resolved without a substantial and mutual realignment of priorities at country and regional level – something that certainly will not be achieved in the near future.

However, there is no reason why AusAID should be considered the only option for building development projects around ACIAR’s research activities. Other bilateral and multilateral development agencies, taken collectively, constitute a much larger and more promising source of support for technology transfer.
The establishment of the Australian International Food Security Centre (AIFSC) within ACIAR (whatever one might think of the “centre within a centre” architecture – see below), constitutes a significant new departure for the organisation and an opportunity to use the centre as a focal point for creating new international partnerships for adoption-related work, linked to ACIAR’s research programs. For example, the G20-mandated AgResults initiative will, from 2013, be supporting a pilot, private-sector-oriented animal vaccine adoption program in Africa that is likely to benefit from technology recently developed by the CSIRO and a CGIAR agency, the International Livestock Research Institute. One could envisage a role for the AIFSC in the implementation of such a program, in partnership with others.

➢ **Recommendation 3.** The review should examine ACIAR’s current engagement in the implementation of AusAID-funded development programs with a view to assessing whether it amplifies the impact of core ACIAR work or, alternatively, distracts from the latter. In addition, the review should consider whether the formation of new international partnerships might strengthen the organisation’s ability to achieve adoption outcomes. As the review will undoubtedly consider how to improve engagement between ACIAR and AusAID at a programming level, which question remains important, it should also explore how differences in the two agencies’ operating models contribute to making this question so intractable.

4. **ACIAR’s approach to sourcing expertise**

ACIAR resources are, and always have been, allocated to research activities in a way that is decidedly non-transparent. ACIAR’s web site advises people interested in working with ACIAR that, “we welcome project proposals throughout the year, rather than inviting submissions at a particular time”. It adds, “there is a standing invitation to all who share our commitment to research in sustainable agricultural development, both in Australia and in the region, to explore the possibility of an ACIAR-funded partnership”. The 1998 Nairn Review and the 1989 External Review both
recommended\textsuperscript{10} trialling calls for expressions of interest but this recommendation does not appear to have been acted upon. The 2011 Chubb report makes no reference at all to processes for the procurement of research services.

Competitive and transparent allocation processes have many obvious advantages and are the norm both in allocating small ODA grants under the aid program and in allocating research funding through the Australian Research Council and NHMRC. In recent years, the Australian aid program has introduced a competitive mechanism for development research funding, the Australian Development Research Awards.

Competitive mechanisms are not without their costs, including the risk of high transaction costs if there are detailed bid requirements and a low probability of success. However, non-competitive arrangements also carry considerable risks – for example, that personal animosities will exclude certain researchers, that there is too much “repeat business”, that the personal priorities of program managers will cause investment decisions to be sub-optimal, and so on. Competitive resource allocation need not imply a passive approach, nor, at the other extreme, an approach that inhibits innovation.

Competitive approaches would also be appropriate if it were decided to move in the direction of untying ACIAR funding, for which we have argued earlier.

- **Recommendation 4.** The review should examine processes related to the selection of research activities for funding with a view to determining whether there should be a shift to more competitive approaches, including, as argued earlier, approaches which allow for global competition.

5. **The geographical distribution of ACIAR’s activities**

The Independent Review of Aid Effectiveness identified fragmentation of effort as the major risk confronting the effectiveness of Australian aid. With its expansion over time into Africa, fragmentation is also a risk for ACIAR. The Independent Review’s

\textsuperscript{10} Recommendations 14 and 7, respectively.
suggestions that “country focus is ... important in Australia's strategy on aid to Africa” and that “Australia should restrict itself to a small number of resource-effective, high-impact” country programs (p. 140) are worth recalling and likely apply to ACIAR, especially if the focus is on research adoption, which depends most heavily of all on national effort.

➢ **Recommendation 5.** To avoid risks of fragmentation, the review should consider advising ACIAR to focus its activities in Africa on a small number of countries and/or regional institutions as AusAID has been advised to do.

### 6. Impact evaluations of ACIAR’s research programs

ACIAR reports remarkably high returns to investment from its research, at around 50:1 (including benefits to Australia, which constitute around ten per cent of total benefits). These reported high returns have been influential. For example, they were highlighted by the 2011 Independent Review of Aid Effectiveness (see Box 8.1) and used to argue in favour of increased aid funding for agricultural research.

Returns to investment in the CGIAR system\(^\text{11}\), and also in domestic agricultural research through the various research and development corporations\(^\text{12}\), have been estimated at around 10:1 at best – in fact CGIAR agencies prefer a more conservative estimate of 2:1. ACIAR's reported returns to investment are therefore surprisingly high. The methodology used in calculating them is in all likelihood sound but might differ in certain important respects from that used in the other two cases just mentioned. It would be interesting, therefore, to have a like-for-like comparison of returns to Australia’s investment in the CGIAR system and its investment in ACIAR programs.

More generally, it is well-known that aid evaluations often have an optimism bias built into them: for example, they often assume that progress made during a project's life

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continues into the future, whereas in fact often project achievements are unsustainable. The present review provides an excellent opportunity to assess the rigour and comparability of ACIAR’s evaluation framework.

ACIAR currently uses a relatively stable group of experts to conduct impact evaluations and provide advice on related methodological issues. This is understandable and in fact desirable. However, there is a case for commissioning some fully independent review work in this area from time to time. Logically, it would be responsibility of the Office of Development Effectiveness (ODE), housed in AusAID but charged with providing independent evaluation services with respect to all Australian ODA, to oversee this.

➢ **Recommendation 6.** The review should undertake an in-depth appraisal of the rigour and comparability of the methodology used in ACIAR-commissioned studies on returns to investment in ACIAR activities. In addition, the review should propose a longer-term role for ODE in relation to evaluating the impact of ACIAR activities.

7. The Australian International Food Security Centre

ACIAR’s establishment was announced at the 1981 Commonwealth Heads of Government Meeting (CHOGM) in Melbourne, and it has been described as a “child of CHOGM.” 14 30 years later, at the 2011 CHOGM in Perth, the Australian Government announced the Australian International Food Security Centre (AIFSC) as a centre within ACIAR, with funding of $A36 million and a mandate to provide, according to the Prime Minister, “valuable agricultural research and advice to African countries”.

Little attempt was made at the time of AIFSC’s announcement to articulate publicly why AIFSC was needed and how it would differ in function from its host organisation, ACIAR, which is already active in Africa. While ACIAR was created after a long period of public

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13 One of the authors of this submission (Davies) was involved to an extent in the initial conception of the AIFSC in his former capacity as an AusAID official in 2011.
debate – it was first mooted in the 1976 report of the Crawford Study Committee – there was no such agitation for the creation of this new centre.

The ACIAR website contains the following rationale for a separate centre:

_The AIFSC is making a significant contribution to addressing food security by providing a bridge between agricultural innovations (technologies, policies and practices) and their adoption by smallholder farmers, including livestock keepers._

Given AIFSC’s embryonic stage, the use of the present tense seems inappropriate. But, setting this aside, this statement could perhaps provide a justification for a new centre or functional unit within ACIAR if this building of bridges between research and smallholders were outside of ACIAR’s existing mandate. In fact, however, it is not. It is completely consistent with ACIAR’s legislation, and, more than that, a current priority for ACIAR. ACIAR’s 2010-11 Annual Report gives great weight to this idea of focusing on adoption by small holders:

_One of the main efficiencies in projects using agricultural research for development is leveraging existing technologies, and science, and adapting these into smallholder farming contexts. This means understanding the science, and the context, and bringing them together in projects to use technologies, research and knowledge not yet disseminated in developing countries. It also supports developing country scientists, and smallholder farmers in their critical challenge of gaining access to the latest in scientific innovation in agriculture. (p.7)_

A fuller account of AIFSC’s role and priorities was provided in a strategy document for the period 2012-2022 which was released on 30 November 2012. This elaborates on the rationale articulated above and adds a heavy emphasis on forming and exploiting international partnerships as a way of increasing the impact of Australian agricultural research for development. However, it also contains a strong emphasis on research (principally “policy research” on barriers to adoption) as a function of the AIFSC itself,

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which obviously creates the potential for overlap with mainstream ACIAR work, and more generally fails to draw any definite boundary around its work on adoption vis-à-vis ACIAR’s mainstream work in this area.

A better articulation of the rationale for the AIFSC is needed – one that clearly explains how it promotes food security in ways that leverage and complement the existing work of ACIAR, rather than in ways that might duplicate that work. Absent this, the sceptical observer could be forgiven for thinking that the new centre was simply an “announceable”, and that the decision to create it, rather than simply increasing ACIAR funding for Africa, was for taken for political reasons.

This is not to say that there might be no benefits from AIFSC’s creation. In fact, the centre could deliver several benefits. This could happen, for example, if it really were able to function effectively as a platform for forging new partnerships with other bodies that invest in or conduct agricultural research for development, or if it were able to stimulate innovation through competitive resource allocation (AIFSC is talking of introducing challenge funds) or if it were able to increase ACIAR’s engagement in public-private partnerships for agricultural development. If it were able do these things, it would be helping ACIAR fulfil its existing mandate in new and potentially more effective ways.

Alongside these benefits, however, must be set the costs, in terms of administration and clarity, of having a new “centre within a centre.” The administrative costs fall not only on Australia (through additional staff in both Canberra and Africa, a separate advisory committee, and so on) but also on development partners in Africa who now have to deal with yet one more player in the field. More fundamentally, one has to question whether there were not better, more efficient and less confusing ways of spurring innovation within ACIAR.

Looking forward, the most urgent need is for the relationship between AIFSC and its host organisation, ACIAR, to be clarified, both in terms of objectives and in terms of institutional structures and processes. A sensible way to do this would be to reconceive AIFSC as an integral functional unit of ACIAR dedicated to innovative approaches to
promoting the adoption of research outputs – and to rename it accordingly, in due course. In addition, the next independent review of ACIAR, which, as we suggest below, should take place within another five years, should have as part of its terms of reference an explicit consideration of the relevance and effectiveness of AIFSC and a requirement to make recommendations as to its future.

➢ **Recommendation 7.** The review should strongly encourage ACIAR better to articulate the rationale for and priorities of AIFSC, situating these clearly with respect to its existing legislated functions and having regard to the level of resources allocated. The review should provide guidance to ACIAR in this regard, with an emphasis on positioning AIFSC as a unit within ACIAR (not as a centre itself) responsible for trialling innovative approaches to promoting the adoption of research outputs, with an initial focus on Africa but with the objective of eventual mainstreaming across ACIAR's operations. The next independent review of ACIAR should assess the extent to which it has succeeded with respect to its objectives, as clarified, and make recommendations as to its future.

8. The 2011-12 Strategic Framework Panel

Toward the end of 2011, ACIAR convened a four-person independent panel, chaired by Chief Scientist Ian Chubb, to provide to the then Minister for Foreign Affairs a strategic framework “for the planned future expansion of international agricultural research.” Released in February 2012, the Chubb report outlined a “five point approach to further improving the effectiveness and efficiency of agricultural research delivered under the auspices of Australia's aid program.”

And then, a few months ago, the current Minister for Foreign Affairs announced the present review. It is impossible to detect the rationale behind this chain of events. Why is it necessary to have two similar processes, both addressing questions of effectiveness and efficiency, so close to each other? Why invite one panel to develop a strategic framework for future action before inviting another panel to conduct a full external

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review of ACIAR? If two exercises are needed, surely the full external review should precede the development of a strategic framework for future action, with the latter perhaps constituting an element of the Government’s response to the external review. In addition, both panels were given very tight timelines, stretching over just a few months. It would have been better to have one in-depth review, with a longer time-frame.

More generally, we note that the 10-year sunset clause contained in the original (1982) ACIAR legislation was removed in 1992 on the basis of a commitment to undertake regular reviews. However, the last full external review was the Nairn Review of 1998. ACIAR should be made subject, as the aid program now is, to regular independent reviews, at say five-yearly intervals. Ideally, such reviews would be conducted in parallel with, and in close co-ordination with, regular reviews of the Australian aid program.

➢ **Recommendation 8.** The review should consider the appropriateness of the conclusions of the Chubb report in light of information, analysis and perspectives that were not available to the Chubb review panel owing to its limited terms of reference. In addition, the review should include recommendations relating to the timing and conduct of future independent reviews of ACIAR.

*Submitted 4 December 2012*