



**Facilitating the commercialisation of products  
from GM sugarcane**

**Communications Plan**

**June, 2007**

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## 1 Introduction

This document has been developed by the Sugarcane Gene Technology Group (GTG) with assistance from Cox Inall Communications.

The document provides a five year Strategic overview to guide communications across the sugar industry supply chain while GM cane technology is being developed for commercialisation.

The document also provides a detailed two year Communications Plan to guide communications to engage stakeholders and raise industry awareness of GM issues and industry capacity to support GM cane commercialisation.

The Sugarcane GTG is mindful of the commercialisation issues facing other agricultural industries, in particular the grains industry, and of the work of the Primary Industries Ministerial Council (PMIC) as it works towards facilitating a framework to enable commercialisation of products from GM technologies.

There is a clear need for the establishment of a framework on an industry-by-industry basis. The Sugarcane GTG is working to develop such a framework for the sugar industry, and this document also assists in the communications of this endeavour.

## **2 Strategic Overview 2007 to 2012**

Qualitative research has been conducted with more than 20 industry and supply chain stakeholders to scope strategic issues, views and positions on the commercialisation of GM cane.

Research has indicated that the focus of the industry should be on developing capacity within and across the sugar industry to understand, explain and support the development of suitable GM cane varieties, and be in a position to adopt the technology in five years time.

Reflecting the primary need of stakeholders to ensure market access for and acceptance of GM cane, the industry will need to use this time to engage with and win over the sugar supply chain, especially the major raw and refined sugar customers in the domestic and export markets.

SGTG can assume that it will not win over consumers in the short or long term. There is no upside in proactively communicating with consumers or with negative stakeholders until industry is clear about its commercialization plans (i.e. planting dates for commercial crops, varieties, traits, end uses and supply chain management) and the benefits of adopting the technology are clear and proven.

It is recommended that industry proactively manage consumer, production and supply chain issues as they emerge, rather than attempt to change consumer perception on GM sugar.

The eight strategic drivers (below) have been identified from discussions with industry participants – from the grassroots to the leadership level - including members of the Steering Committee, and from a review of issues arising from the commercialisation of GM cotton varieties, and past and current endeavours to commercialise GM canola varieties.

These eight strategic drivers have shaped the recommended communications activities for 2007 to 2009.

### **2.1 Marketing Strategy**

Research finding: There is industry-wide consensus that adoption of the technology must not jeopardize market access and share.

Industry needs to develop an agreed strategy for exploring customer issues and the means of meeting their requirements; rather than approaching individual customers one-by-one as opportunities might arise.

Consumer marketers (and more than one mill) have contractual agreements with end users to provide non-GM sugar cane products from non-GM processing systems. Unwinding these agreements may be difficult and sensitive. The impact of any non-GM or GM-free labelling of products, whether to meet either marketing or regulatory requirements, needs to be considered.

## **2.2 Sugar industry GM platform**

Research finding: Industry is looking to an organisation to provide a Shared Vision, leadership and ongoing coordination.

The Steering Committee needs to develop a vision for a resourced, industry body to carry the issue and the industry forward.

This body needs to represent and accommodate the commercial imperatives of stakeholders, coordinate industry policy with the Queensland government, and explore customer issues and the means of meeting their requirements.

The industry needs good international trade and market intelligence to track uptake of sugar from GM cane and GM sugar beet into the supply chain and be proactive in communicating this to Government, the Australian raw sugar industry and refiners.

The establishment, resourcing and funding of the 'platform' body will be a key consideration as the Steering Committee moves to implement the Plan. The body could be the Sugarcane-Genetic Technology Group or another industry body. In this plan, for ease of exposition, it is assumed the SGTG will fill the role.

## **2.3 GM cane commercialisation window**

Research finding: That there will be no commercial plantings until at least 2012 provides industry with five years to fully prepare.

Industry needs to use the time period available before GM varieties are ready for release to resolve the question over licensing arrangements, pricing and usage conditions.

A scheduled plan for varietal release and adoption also needs to be developed which takes account of, and aligns industry, government and community needs.

This timeframe provides industry with the scope to develop strategies, action plans, roles and responsibilities before having to manage issues in the public arena.

## **2.4 Supply chain management issues**

Research finding: Industry is faced with deciding how to provide choice and market access opportunities to producers and customers, and whether it will be delivering GM cane derived sugar to food uses, industrial uses or both.

Providing producers and consumers with choice in all products from GM cane, will require the industry to understand all market considerations, including the development of an agreed position on Segregation and Identity Preservation (SIP) and coexistence, where required.

The marketing positioning requirements (GM-free labelling etc) of key stakeholders (mill/mills, marketers, customers) should be scoped and accommodated, to meet commercial imperatives.

There is a question mark over what impact extra production will have on an oversupplied market. The dynamics of the ethanol market, and future industrial uses, need to be scoped.

## **2.5 Increasing awareness**

Research finding: General internal industry awareness and understanding is very low. Education is a priority requirement.

An informed, supportive industry that is confident in responding to issues in the right way, at the right time, at the right volume is required.

The beneficiaries (and losers) of GM cane will need to be identified and engaged with regularly and as needed. As part of internal industry communication, specific messages will be developed about the benefits particular traits will bring to the industry (production) and the wider environment (off-site benefits).

Industry will need to develop comprehensive, evolving information material, packages and delivery systems for:

- Government
- Industry sector representatives, decision makers and key influencers
- Consumer requests for information
- Media

## **2.6 Government relations**

Research finding: The Queensland government is a very strong supporter of biotechnology, and acknowledges the benefits that GM cane can provide. But it has not yet had to make a decision on a GM food crop.

The next Queensland election is due by September 2009.

The Queensland government wants to see outcomes from government investment and it is comfortable with the national regulatory framework (OGTR, FSANZ, APVMA etc).

Industry should develop a method of ensuring ongoing close relationships with government and agencies and provide information about plans, timelines, developments pre- and post- the 2009 election.

This information flow should include intelligence and material about the adoption of GM technology (in sugar producing GM crops and other food GM crops) in other countries to provide context of Australian - global developments.

It is noted that the OGTR approved the use of foods derived from GM sugar beet ('Roundup Ready') in May 2002.

## **2.7 Engaging environment, NGOs and the community**

Research findings: Environmental considerations are vital. Green groups will play a lead role in influencing local community thinking and political positioning in a GM cane debate.

Green groups range from being blindly opposed to needing to be assured about the benefits of the technology to the environment and human health.

Greenpeace and GeneEthics are expected to remain vehemently and ideologically opposed to the technology. Industry need not engage with these groups for some time, though their activities should be monitored.

Local environmental groups tend to be more locally focused and need to be convinced of the local environmental and social benefits of technology (i.e. if there is a net environmental benefit; particularly in lessening off-site impacts of cane, there would be less opposition to the technology).

Local groups will need to be engaged and provided with validated, scientifically focused information highlighting environmental and social benefits in a timely and appropriate manner.

## **2.8 GM technology**

Research findings: There are a range of advantages and potential challenges which need to be identified, defined, addressed and communicated.

The advantages can be summarized as:

- Agronomic and cost-of-production benefits
- Human health benefits
- Sustainable source of industrial products
- Diversify industry income base
- Environmental benefits
- Future international competitiveness increases

The challenges can be summarized as follows:

- Marketing/market impact
- Uncertainty over environmental impact
- Supply/demand balance impact
- Technology adoption expenses
- Change management
- Industry resources to be diverted/allocated to information campaigns

Generally, those who will receive a direct economic benefit from the technology will support GM cane; other stakeholders, the community and sugar customers will tolerate it.

Information materials need to be created that meet the needs of these two groupings. These will need to communicate the advantages and communicate that the challenges have been addressed/resolved.

### **3 Communications Plan 2007 to 2009**

#### **3.1 Objectives**

The objectives of the Communications Plan are:

1. Ensure the Australian, Queensland, Western Australian, New South Wales and relevant Local Governments support the commercialisation of GM cane
2. Ensure relevant stakeholders are fully informed and engaged and satisfied that industry can properly manage the technology
3. Pre-empt and assist industry to manage public debate by increasing industry's awareness of GM technology and its capacity to respond to issues confidently in the public domain
4. Ensure communication about GM cane is based on agreed facts, evidence and sound-science; not opinion, emotion and perception

The principles informing the tone and style of the communications plan are:

- The SGTG is committed to transparency and honesty in the provision of public/consumer/market information and will actively engage in constructive debate with all stakeholders
- The SGTG is committed to the provision of reliable information, based on solid science and case-by-case analysis of specific issues and benefits, in relation to specific traits considered for sugarcane improvement

#### **3.2 Key messages**

Nine key messages have been developed to use in Communications activities:

1. GM cane technology is being developed by the Australian sugar industry, for the Australian sugar industry
2. The adopted technology will have been tested and approved by the national regulatory framework as safe for the environment and safe for humans
3. There is currently no GM cane in commercial production in Australia
4. There is wide and strong industry support for adoption of GM cane
5. The sugar industry will develop GM technology mindful of any potential impact on other landholders and users of sugarcane products
6. The sugar industry is considering the requirements of its customers and consumers and will develop processes to meet their requirements
7. The sugar industry wishes to provide choice to producers, the supply chain and consumers, and is considering all market considerations, including, where required, the need for segregation and identity preservation
8. The technology will allow the Australian sugar cane industry and its reliant communities to remain competitive in the global marketplace

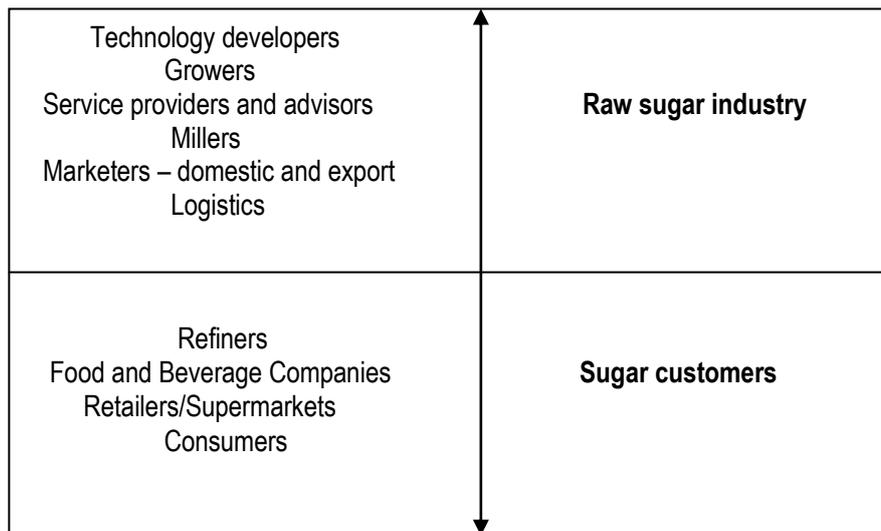
9. GM technology can provide numerous advantages for farmers through environmental and production advances

### 3.3 Target Audiences

All audiences are to be segmented by their likely role in the project, what information they need and when they need to have it, how they are engaged and how their knowledge and attitudes are monitored.

This information will be stored, and used by, SGTG in future communications activities.

Describing the sugarcane supply chain:



#### 3.3.1 Government audiences

For implementation of the Plan, detailed databases of governments and agencies will need to be assembled, including:

- Queensland Government - Primary Industries, State Development, Natural Resource Management, Environment and Health agencies and respective Ministerial offices, including the Premier's Office, key local Members and shadow Ministers
- NSW Government - Primary Industries, Environment and Health agencies and respective Ministerial offices, including the Premier's Office, key local Members and shadow Ministers
- Federal Government - DAFF and Health, specifically the OGTR and FSANZ, and the respective ministerial offices and key local Members and shadow Ministers
- Local Government where GM cane (trials and commercial scale) will be grown

#### 3.3.2 Industry audiences

For implementation of the Plan, detailed databases of the sugarcane industry and representative bodies will need to be assembled, including:

- growers and their organisations

- input suppliers/service providers (germplasm, crop production products, advisors)
- science and technology providers & agencies, the scientific community
- millers
- marketers and exporters

### 3.3.3 *External Stakeholder audiences*

For implementation of the Plan, detailed databases of raw sugar customers and consumers and representative bodies, activists and media, will need to be assembled, including:

- Australian and international sugar refiners
- food and beverage processors, manufacturers and marketers
- retailers and supermarkets
- consumers and their representative bodies
- third party activists
- media.

SGTG will make use of existing industry resources and facilities where possible. Agrifood Awareness Australia Limited (AFAA) already monitors developments occurring on GM issues across a range of agricultural industries and different Australian jurisdictions. Establishment of a formal working relationship with and membership of AFAA would enable SGTG and the sugar industry to stay connected with government and industry developments in gene technology.

## 3.4 **Communication Program**

The Shared Vision, which has been accepted by the Steering Committee and supported by industry associations, is a key communication tool for liaison with industry, government and stakeholders.

The Shared Vision outlines the objectives and principles supporting the commercialisation of products from GM cane and describes the role of the SGTG and technology developers.

The following communication activities are segmented according to target audiences.

### 3.4.1 *Government*

#### *Objective*

Develop close and ongoing working relationships with government – both with departmental agencies and politicians and their advisors.

#### *Actions*

A series of briefing meetings will occur over the next two years with government. These will focus on providing information on the technology being developed, advantages, timeframes, possible commercialisation plans and how any issues are being addressed by the SGTG.

- i. The SGTG and industry associations will engage with the Queensland Primary Industries & Fisheries, State Development, Natural Resource Management, Environment and Health

agencies, their respective Ministers and Ministerial offices, including the Premier's Office, and key local Members and shadow Ministers.

To streamline and co-ordinate the process, SGTG will define the most appropriate contact points within the agencies and politicians offices and establish two 3-member 'government liaison sub-committees'.

- The first committee will focus on engaging with Government agency representatives once per quarter. This group will consist of SGTG Chair and two SGTG representatives.

These meetings will provide a forum for two-way flow of information about the status and progress of the initiative, and the requirements of industry and government going forward.

- The second (higher level) committee will focus on engaging with Ministers and Shadow Ministers once per year in June 2007 and June 2008. This group will consist of two industry leaders and the SGTG Chair, who have been thoroughly briefed by SGTG.

The meetings will explain the SGTG 's role, the status and progress of the initiative, issues management activities, and to enable the SGTG to be available to brief the Government on progress and issues when required.

- ii. The SGTG shall engage with the Queensland government, DAFF and PIMC (through the Queensland government) to understand the proposed national, industry managed, framework for GM canola and future GM crops, and how the sugar industry might be positioned under that framework. The SGTG shall also use this process to encourage the Queensland government to work with southern counterparts to address the moratoria issue.
- iii. The SGTG will engage with the NSW government in a stepped process involving NSW growers. Through the NSW sugar milling co-operative and relevant NSW Canegrower representative bodies, appropriate people will be selected and briefed. A NSW cane growing leadership group will be developed and taken to brief the NSW Department of Primary Industries on the sugarcane industry's GM cane plans. This group will then liaise with the NSW DPI as required, with assistance from SGTG. The NSW group and the SGTG can then move jointly to engage with other NSW agencies, Ministers and Shadow ministers.
- iv. The SGTG will also develop a relationship with the Queensland Biotechnology Advisory Council and establish two-way updates on initiative progress. This can occur in the form of a joint meeting once a year, either in Brisbane or a sugar producing region.

#### 3.4.2 *Industry*

('Industry' is defined as raw sugar industry from growers to marketers inclusive)

*Objective*

Increase industry awareness and understanding of the technology and what is required for its successful adoption, and to increase the capacity of industry to respond to issues.

*Actions*

A series of briefing meetings will occur over the next two years with industry. These will focus on a dialogue and exchange of information with key sugar industry stakeholders on the technology being developed, advantages, timeframes, possible commercialisation plans and how any issues are being addressed by the SGTG.

- i. SGTG will brief the Australian Sugar Milling Council annually at an ASMC meeting.
- ii. SGTG will arrange and co-ordinate briefings with Canegrowers, ACFA and relevant grower representatives annually. These meetings will occur as an adjunct to pre-arranged meetings.
- iii. SGTG will brief the public affairs/communications officers of SGTG stakeholder organisations (grower bodies, SRDC, BSES/District Productivity Services, Millers and Marketers) on the SGTG Communications Plan as soon as possible in 2007. Their communication channels should be used conservatively for the next two years and be largely focused on raising awareness and understanding of GM sugarcane science, rather than adoption or supply chain issues.
- iv. SGTG will develop a network of informed and supportive growers at regional levels.

In 2008, SGTG will begin cultivating a mixture of leading cane growers – across age groups and genders – to increase their capacity to be local technology advocates to media and government from 2009 onwards.

The ideal outcome is a network of 30 to 50 growers who are well informed, understand the nuances and can assist industry to deliver key messages in a coordinated manner.

Specifically, Canegrowers, ACFA, relevant grower bodies and BSES shall identify and nominate growers who meet SGTG criteria to participate in an 'invite-only' technology leadership development programme convened by SGTG, held either up-country or in Brisbane.

The programme will include study modules and take-away materials on:

- GM cane science and commercialisation plans
- The Australian GM regulatory system
- GM cane marketing
- Communications and Issues Management plans

The programme will be delivered by SGTG scientific, milling and marketing personnel, and will be conducted in 2008 and thereafter yearly (or with increasing frequency if required) until GM sugarcane is established in the production system.

### 3.4.3 *Research Community*

#### *Objective*

Engage with, increase awareness and achieve understanding of the Communications Plan by the GM cane research community and technology developers. Establish ongoing dialogue on plans and activities.

#### *Actions*

SGTG supported by industry leaders will brief the research community and the technology developers and their public affairs/communications officers on the SGTG Communications Plan as soon as possible in 2007. SGTG should:

- encourage discussion about the across-industry benefits of presenting and maintaining a coordinated position to the general public, industry and government, and
- seek establishment of a system enabling regular information exchange and activity update, particularly before information regarding GM sugarcane is publicly released

Meetings with researchers and technology developers and their public affairs/communications officers will be held twice per year to more formally jointly review actions, areas of coordinated activity and develop any collaborative plans.

### 3.4.4 *Refiners and raw sugar customers*

#### *Objective*

Engage with refiners and raw sugar customers, demonstrate industry capacity to manage issues and assist on questions of marketing needs at appropriate times, especially with Sugar Australia.

#### *Actions*

SGTG will develop a strategy of engaging the key managers in refiner and raw sugar customer companies and organisations, in both the domestic and export markets, in 2007 for implementation in 2008.

The intention is to explore customer issues and the means of meeting their requirements on using sugar derived from GM cane.

SGTG will need to have identified its position and capacity on segregation and identity preservation issues.

### 3.4.5 *Consumers*

#### *Objective*

Ensure that industry organisations which receive consumer inquiries (refiners, marketers) have industry agreed responses to hand for use in contact with consumers.

#### *Actions*

A network of public affairs and consumer advocacy staff will be established, and regular quarterly telephone hook-ups will be conducted to compare notes on consumer (and other) inquiries. These

inquiries shall be fed back into the media monitoring/issues management process to provide insight into public sentiment.

Sugar Australia is likely to receive many direct consumer calls.

SGTG will provide to public affairs officers and consumer advisory staff in each company, upon request, Question and Answer documents - based on the key messages and company requirements – to assist the answering of consumer inquiries.

Inquiries about science should be directed towards, and handled by, specialists in the CRC-SIIB, utilising the key messages in the SGTG Communications Plan.

#### 3.4.6 *Media*

##### *Objective*

Strategically respond to requests for information from media with relevant spokespeople using agreed key messages.

##### *Actions*

The over-riding principle of SGTG maintaining a low-profile until commercialisation plans are well developed shall be adhered to. Even so, SGTG spokespeople will need to be available to debate sugar industry GM technology activity if required.

Where individual companies or technology developers are asked to comment on matters within their business interest or expertise, those companies or technology developers shall provide the spokespeople and use the SGTG Shared Vision and the Communications Plan's Key Messages as guidance.

Where SGTG is asked to comment, the Chair should do so after consultation with SGTG members, and using the Shared Vision and the Communications Plan's Key Messages as guidance.

Public commentary should be based on communicating the scientific research that is being conducted, rather than debating future issues and topics in the media during 2007 and 2008.

This media policy and strategy will be reviewed in 2008 and 2009.

##### *Media Management and Responding to Activists*

Specific implementation tasks need to be completed:

- Further development of plans to manage industry's eight key strategic driver issues
- Agreed response mechanisms and who is to speak on what matter
- A process for notification of industry stakeholders should an issue arise
- Media and message training, pre-interview briefing and planning to ensure spokespeople are confident and clear on what they are saying on behalf of industry

- Early warning scanning of what activists are up to (system needs to be established – website monitoring, obtaining newsletters, observing activities)
- Daily media monitoring and response preparation and organisation

## **3.5 Communications Products**

### *3.5.1 Fact Sheets*

Initially, the SGTG will develop one fact sheet about GM cane. It will be based largely on the agreed key messages in this Plan and contributions from technology developers.

Over the next two years additional fact sheets will be developed for:

1. Why the Queensland industry is researching GM cane
2. GM technology advantages
3. Environmental safety of GM cane
4. Human safety of products derived from GM cane
5. Commercialisation plans

These will be used by spokespeople, and used for articles in industry publications.

### *3.5.2 Website*

No special website is required for the next two years.

## **4 Implementation**

Although the first commercial release of GM sugarcane is at least five years away, a number of actions are required to implement this plan to smooth the pathway for commercialisation. These include:

- raising industry awareness and support
- meeting information provision requirements
- engaging stakeholders and governments
- ensuring regulatory compliance
- preparing industry, communities and customers for adoption of GM cane

In the early stages, four levels of activity are necessary:

1. Information gathering and distribution, preparation of fact sheets, coordination of dialogue and activities amongst researchers and proponents of GM sugarcane, engagement with government, industry and researchers to raise awareness and manage emerging issues.

It is recommended the SGTG continues to fill this role.

2. As a means of staying connected with industry activities and affairs regarding gene technology, SGTG should maintain a close relationship with Agrifood Awareness Australia Limited (AFAA). AFAA is an industry initiative, established to increase public awareness of, and encourage informed debate and decision-making about, gene technology. AFAA believes it is critical that

the industry has access to credible, balanced, science-based information in order to make informed decisions.

It is recommended that SGTG develop a formal relationship with AFAA.

3. In the third quarter of 2007, a high level meeting between representatives of the Steering Committee and the Queensland government to provide a briefing on the industry's GM sugarcane research and related activities, and the expected benefits of GM cane adoption. The briefing will also assure the government that the industry is aware of and working within the state government framework and all regulatory requirements, and is mindful of the PIMC process for GM crops.

It is recommended that SGTG arrange and facilitate this meeting.

4. Governance, oversight and coordination of activity as the industry and proponents of GM sugarcane products move along the commercialisation path.

It is recommended that SGTG continues to provide this role and responsibility, and that government be informed of this.

These activities will have a modest resource requirement. The most significant of which will be the time and energy of those participating in SGTG activities and, less intensively, the industry leadership group and a subscription to AFAA.

It is recommended that the present membership of SGTG (ASMC, Canegrowers, ACFA, CRC-SIIB, BSES, CSR and QSL) continues and that these organisations continue to finance the participation and activities of their representatives.

To undertake the actions in the Communications Plan, the SGTG will require monetary expenditure, for example, to engage professional resources to enable timely responses to specific requests or issues, and an annual subscription to AFAA. Previously, the industry has provided funds for necessary projects, as was the case for the development of the Communications Plan. Funds were raised from proponents (CSR), research bodies (CRC-SIIB, SRDC and BSES) and industry organisations (ASMC, Canegrowers and ACFA). The AFAA subscription is to be negotiated.

It is recommended that the SGTG be authorised to call on the sponsoring organisations for funding in similar fashion.

## 5 Macro timeline

Shaded areas indicate periods of SGTG activity per key event

Key events	May 2007	Aug 07	Nov 07	Feb 2008	May 08	Aug 08	Nov 08	Feb 2009	May 09	Aug 09	Nov 09	Feb 2010	May 10	Aug 10	Nov 10	Feb 2011	May 11	Aug 11	Nov 11
<b>State GM Moratoria</b>	Reviews announced			Moratoria determined															
<b>OGTR approval for GM cane</b>																GM cane approval sought			
<b>Supply chain engagement on SIP</b>																SIP position finalised			
<b>Commercialisation plans</b>										Identify stakeholders and develop plans						Plans developed			
<b>Industry engagement</b>	Develop strategy																		
<b>Govt agency engagement</b>	Identify contacts & meet every quarter									Review engagement									
<b>Political engagement</b>	Identify contacts & meet yearly									Review engagement									