

# RESPONSE AND IMPLEMENTATION PLAN

Independent Performance Review of  
Sugar Research Australia Limited  
2016-2020

December 2020

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## Background

Sugar Research Australia Limited (SRA) is required to commission an independent review of its performance every four years, as per Section 18 of the Statutory Funding Contract (SFC between SRA and the Commonwealth Department of Agriculture, Water and the Environment).

Forest Hill Consulting (and associates) was appointed in April 2020 to undertake SRA's Independent Performance Review.

The review was completed during May to September 2020 and the Final Report was accepted by the SRA Board in October 2020.

## SRA Board response and implementation plan

The SRA Board welcomes the overall findings of the Independent Performance Review, particularly the findings that there were no instances of non-compliance with SFC obligations and that there are things that SRA does very well and are highly regarded for, including its comprehensive planning and reporting and its communication activities and materials. The Board also notes there are several areas in which performance could be improved and this implementation plan outlines the actions SRA will take to make the necessary improvements.

The Board also acknowledges the comprehensive stakeholder consultation, review and analysis undertaken by the reviewers in delivering their Report.

This document provides the SRA Board's formal response to the findings and recommendations made in the Independent Performance Review Report. It briefly outlines the enhancements SRA is in the process of making and how SRA intends to introduce further improvements to our governance, strategic and investment management systems and processes in response to the recommendations in the Report.

The reviewers have categorised their recommendations as either:

- **CRITICAL:** should be implemented as a matter of urgency in order for SRA to meet its legal and regulatory obligations;
- **IMPORTANT:** actions that are expected to deliver significant benefits to the organisation and sector; or
- **BETTER PRACTICE:** expected to deliver incremental performance improvements.

There are 16 recommendations in total, with only one critical recommendation which has already been addressed by SRA. There are six recommendations rated as important and nine rated as better practice.

The Board's response to each of the recommendations is detailed below, including an implementation plan with associated actions and milestones.

RESPONSE	IMPLEMENTATION PLAN	
	ACTIONS	MILESTONES
<p><b>Recommendation 1 – CRITICAL:</b> <i>The Board should commission a formal review of the governance implications of the RFP as it is constituted, including any conflicts with the CEO’s role and impacts on the effective and efficient functioning of SRA.</i></p>		
<p><b>SRA agrees with this recommendation.</b></p>	<ul style="list-style-type: none"> <li>• Prior to completion of the Independent Performance Review, SRA had identified significant structural and operational issues with the investment governance process of the Research Funding Panel (RFP).</li> <li>• SRA commissioned an independent legal review of the powers and functions of the RFP, as set out in SRA's Constitution and the RFP Charter, and options available to SRA to address both governance and performance issues in respect of the RFP. This legal review was undertaken in the context of a comprehensive strategy and operating model review, and in the context of the ANAO Performance Audit Report no.21 2019-20 on <i>Probity Management in Rural Research and Development Corporations</i>, dated December 2019.</li> <li>• The legal review was completed in October 2020 and identified options to improve the structural and operational issues with SRA’s investment governance framework.</li> <li>• SRA presented these options to industry and stakeholder workshops in November 2020, with participants indicating general support for structural changes to SRA by way of change to the Constitution.</li> <li>• The SRA Board has agreed to pursuing the constitutional changes which include the abolition of the RFP and its replacement by an industry-based Investment Advisory Panel and the establishment of a centralised R&amp;D portfolio management function.</li> <li>• SRA will undertake a comprehensive consultation process with its Members, levy payers and the Commonwealth Minister for Agriculture to fully explain the proposed constitutional changes, in preparation for a Special Resolution of SRA’s Members.</li> </ul>	<ul style="list-style-type: none"> <li>• COMPLETED – Review of RFP governance arrangements – Oct 2020</li> <li>• COMPLETED – Levy payer and stakeholder consultation on investment governance options completed – Dec 2020</li> <li>• Consultation process on proposed constitutional changes Jan – July 2021</li> <li>• Special Resolution for constitutional changes – Oct 2021</li> </ul>

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<b>Recommendation 2 – BETTER PRACTICE:</b> <i>The RFP should be subject to annual performance review in the same way as the Board and other committees, whether as part of the Board evaluation process or separately.</i>		
<b>SRA agrees with this recommendation.</b>	<ul style="list-style-type: none"> <li>The Board will review the RFP's performance and its operations against the Charter, as part of each annual formal SRA Review of Performance.</li> <li>The Audit and Risk Committee (ARC) will commission independent probity reviews as part of SRA's internal audit function.</li> <li>Subject to Members agreeing via Special Resolution for constitutional changes to abolish RFP, the new Investment Advisory Panel will also be subject to annual performance reviews, independent probity reviews and regular reporting to the ARC.</li> </ul>	<ul style="list-style-type: none"> <li>Annual Performance Review – Dec 2020 – Feb 2021, yearly thereafter</li> <li>Reporting to ARC meetings – Mar 2020 and every two months thereafter</li> </ul>
<b>Recommendation 3 – IMPORTANT:</b> <i>SRA should continue its increased focus on workplace health and safety, including consideration of changes to the current Board committees to elevate the prominence of safety in the company.</i>		
<b>SRA agrees with this recommendation.</b>	<ul style="list-style-type: none"> <li>Safety is the number one priority for SRA.</li> <li>SRA Board has elevated its review and oversight of safety across SRA and the ARC and People, Performance and Remuneration Committee (PPRC) will play a stronger role in reviewing safety planning and performance.</li> <li>In addition to the Board, Health, Safety and Environment (HSE) reports will be provided to the ARC.</li> <li>Safety highlights and key messaging to be disseminated to SRA staff on a more regular basis.</li> <li>3-year Safety Management Plan to be developed to drive key initiatives and activities to achieve improvements in workplace health and safety, underpinned by safety leadership and a positive safety culture.</li> <li>Ongoing SRA site safety management committees and Safety Executive Management Committee (SEMC) activities and meetings to review incidents, ensure compliance and promote safe practices.</li> </ul>	<ul style="list-style-type: none"> <li>COMPLETED – HSE reports provided to Board and ARC meetings and review of the HSE reports is now a standing agenda item in both meetings</li> <li>COMPLETED – Monthly 'Safety Bites' to all staff commenced Nov 2020</li> <li>Safety Management Plan endorsed by ARC and approved by Board – Dec 2020</li> <li>COMPLETED – Review of incidents, incident investigations and findings incorporated into SEMC meetings as a standing agenda item</li> <li>COMPLETED – Audit and inspection findings are tabled at SEMC meetings</li> </ul>

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<b>Recommendation 4 – BETTER PRACTICE: <i>SRA, in conjunction with Industry Representative Bodies, should consider the development of an industry plan / vision. ASA should drive, while SRA may facilitate, the development of the plan.</i></b>		
<b>SRA agrees with this recommendation.</b>	<ul style="list-style-type: none"> <li>SRA has long recognised the need to assist the sugarcane industry in the development of an industry vision and strategic plan.</li> <li>SRA convened and facilitated an industry leaders' forum (Boards of SRA, CANEGROWERS, Australian Sugar Milling Council and CEO of Australian Cane Farmers Association) in September 2020 to commence the development of a shared working vision for the industry, as well as shared agreement on a number of priority areas for the industry to focus on.</li> <li>The Australian Sugar Industry Alliance (ASA) organisations are now identifying priority actions and developing a draft vision for the future of the sugarcane industry through to 2030.</li> <li>SRA will continue to play a strong role to facilitate the industry leaders' discussions and development of the industry vision and action plan.</li> </ul>	<ul style="list-style-type: none"> <li>COMPLETED – Industry Leaders' Forum – Sep 2020</li> <li>Industry Leaders' Forum to finalise vision and action plan was held on the 8<sup>th</sup> December 2020.</li> <li>Industry leaders have committed to meet in February 2021 to monitor progress against action plan.</li> </ul>
<b>Recommendation 5 – BETTER PRACTICE: <i>SRA should include, in its annual reports, a high-level summary of progress towards the achievement of KPIs from the strategic plan and annual operational plan, as well as the results of any impact assessments undertaken.</i></b>		
<b>SRA agrees with this recommendation.</b>	<ul style="list-style-type: none"> <li>SRA is committed to transparent reporting of performance against its strategic and annual operational plans and the outcomes of R&amp;D impact assessments. To date, SRA has reported this information in its annual performance reports, which are an accompaniment to SRA's annual reports, and six-monthly impact pathway reports.</li> <li>SRA will continue to publish its performance reports and impact pathway reports on its website.</li> <li>SRA will include a high-level summary of progress against its strategic and operational KPIs and a summary of completed impact assessments in its annual reports for 2019/20 and onwards.</li> </ul>	<ul style="list-style-type: none"> <li>COMPLETED – Annual Report – Oct 2020</li> </ul>

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<b>Recommendation 6 – IMPORTANT: SRA should publicly report a summary of actual expenditure on core- versus contestable-funded projects and the methodology used to allocate costs between the two.</b>		
<b>SRA agrees with this recommendation.</b>	<ul style="list-style-type: none"> <li>SRA will enhance its reporting of core (internal R&amp;D) and contestable funded projects and the methodology to allocate costs between the two in future strategic plans, annual operational plans and annual reports.</li> </ul>	<ul style="list-style-type: none"> <li>Core and contestable forecast expenditure and allocation methodology in Strategic Plan and Annual Operational Plan – June 2021</li> <li>Core and contestable actual expenditure and allocation methodology in Annual Report – Oct 2021</li> </ul>
<b>Recommendation 7 – BETTER PRACTICE: SRA should improve the process of providing formal feedback on unsuccessful project funding decisions to both internal and external RD&amp;A providers, which might include providing a summary of the number of internal vs external projects funded and their total budgets.</b>		
<b>SRA agrees with this recommendation.</b>	<ul style="list-style-type: none"> <li>SRA, through the RFP and the Research Funding Unit (RFU), will improve its formal feedback process to unsuccessful funding applicants, including the level of detail provided with respect to investment decisions and funding provided to internal and external providers.</li> </ul>	<ul style="list-style-type: none"> <li>SRA is conscious of need to provide more detailed feedback and has started doing this.</li> <li>Enhanced formal feedback process following investment calls – Aug 2021</li> </ul>
<b>Recommendation 8 – IMPORTANT: SRA should establish a new process to receive advice on cane grower RD&amp;A priorities, project review and selection. Appropriate terms of reference for this (and indeed all) advisory committees should be established.</b>		
<b>SRA agrees with this recommendation.</b>	<ul style="list-style-type: none"> <li>SRA as part of constitutional change will consult with industry and other stakeholders on enhanced industry advisory group with grower and miller representation.</li> </ul>	<ul style="list-style-type: none"> <li>Consultation process on proposed constitutional changes – Jan-July 2021</li> <li>Special Resolution for constitutional changes – Oct 2021</li> </ul>

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<p><b>Recommendation 9 – IMPORTANT: SRA should institute a formal project management process for all core activities and ensure that the same standard of oversight and management is applied to core activities as is applied to contestable projects.</b></p>		
<p><b>SRA agrees with this recommendation.</b></p>	<ul style="list-style-type: none"> <li>SRA will implement a formal project management process for all core activities (plant breeding, biosecurity, entomology, farming systems, laboratory services), with appropriate reporting and governance oversight provided through the establishment of a centralised R&amp;D portfolio management function that will include both core and contestable projects.</li> <li>A transition plan will be developed for implementing SRA’s new operating model, including the centralised portfolio management function.</li> </ul>	<ul style="list-style-type: none"> <li>Core project management process – June 2021</li> <li>New operating model transition plan – March 2021</li> </ul>
<p><b>Recommendation 10 – IMPORTANT: SRA should report, and provide the rationale for, the balance of its RD&amp;A portfolio across key dimensions such as risk/reward and time to delivery, in addition to allocation across KFAs, in its annual reports.</b></p>		
<p><b>SRA agrees with this recommendation.</b></p>	<ul style="list-style-type: none"> <li>SRA will establish mechanisms to report on risk/reward and time to delivery performance for its RD&amp;A portfolio in its annual reports.</li> <li>SRA will also establish mechanisms to report on the allocation of its RD&amp;A portfolio across the research pipeline – from basic research through to commercialisation and adoption.</li> </ul>	<ul style="list-style-type: none"> <li>Annual Report – Oct 2021</li> <li>Revised metrics to be developed and included as part of the Strategy implementation plan</li> </ul>
<p><b>Recommendation 11 – BETTER PRACTICE: SRA should consider the implementation of a grower segmentation strategy with a particular focus on engagement with very large corporate levy payers.</b></p>		
<p><b>SRA agrees with this recommendation.</b></p>	<ul style="list-style-type: none"> <li>SRA will be seeking to establish engagement strategies for various levy payer segments (including very large corporate levy payers, small to medium sized growers, innovators and early adopters, non-adopters etc.).</li> <li>SRA’s Engagement Framework will be reviewed and revised to include engagement strategies for various levy payer segments.</li> <li>An Industry Services function will be established under SRA’s new operating model with a view to improving connectivity and engagement</li> </ul>	<ul style="list-style-type: none"> <li>Revised SRA Engagement Framework – June 2021</li> <li>New operating model transition plan – March 2021</li> </ul>

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	between SRA and growers and millers and expediting adoption of research outputs. This function will work directly with growers, millers, productivity services organisations and industry extension providers to identify R&D needs, regional plans and adoption pathways.	
<b>Recommendation 12 – IMPORTANT: SRA should subject core RD&amp;A activities and projects to the rigour of the Monitoring &amp; Evaluation Framework, notably independent impact assessments in line with CRRDC guidelines.</b>		
<b>SRA agrees with this recommendation.</b>	<ul style="list-style-type: none"> <li>As per actions under Recommendation 9, SRA will implement a formal project management process for all core activities, including performance monitoring and evaluation in line with SRA's Monitoring and Evaluation Framework.</li> <li>SRA's Monitoring and Evaluation Framework is presently being revised to enhance performance measurement, output reporting and impact assessment, including expanding SRA's in-house evaluation capability.</li> <li>Under its new operation model, SRA will be implementing ex-ante evaluations and impact assessments for both core and contestable projects at various stages along the research pipeline.</li> <li>SRA's ex post impact assessments (in line with CRRDC guidelines) will be expanded to include both core and contestable projects.</li> </ul>	<ul style="list-style-type: none"> <li>Core project management process – June 2021</li> <li>Revised SRA Monitoring and Evaluation Framework – June 2021</li> </ul>
<b>Recommendation 13 – BETTER PRACTICE: SRA should conduct true ex post assessments of a random selection of core and contestable projects that were completed 3-5 years prior to the assessment year to obtain a truer picture of adoption and impact.</b>		
<b>SRA agrees with this recommendation.</b>	<ul style="list-style-type: none"> <li>SRA's independent ex post impact assessments will be expanded to include just completed projects (with Final Reports completed in preceding financial year and funded by Queensland Department of Agriculture and Fisheries (QDAF)) and a random selection of core and contestable projects completed 3-5 years prior to the assessment year to enable a more accurate evaluation of adoption and impact.</li> </ul>	<ul style="list-style-type: none"> <li>Expanded ex post evaluation program – April 2021</li> </ul>

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<b>Recommendation 14 – BETTER PRACTICE: <i>SRA should continue with its planned implementation of conducting ex ante benefit-cost analysis of projects as part of their project selection process.</i></b>		
<b>SRA agrees with this recommendation.</b>	<ul style="list-style-type: none"> <li>As per actions under Recommendation 12, SRA will be implementing ex ante benefit-cost assessments of projects at various stages along the research pipeline, including as part of the project proposal and project selection stages.</li> </ul>	<ul style="list-style-type: none"> <li>New operating model transition plan – March 2021</li> </ul>
<b>Recommendation 15 – BETTER PRACTICE: <i>SRA should ask its impact assessment suppliers to provide more detailed commentary on the likely distribution of benefits from projects between sectors of the Australian sugar industry, notably between canegrowers and mills.</i></b>		
<b>SRA agrees with this recommendation.</b>	<ul style="list-style-type: none"> <li>SRA will include in future Terms of Reference for impact assessments a requirement for evaluators to provide detailed commentary on the likely distribution of benefits from projects between the different sectors of the sugarcane industry, specifically between production and processing.</li> </ul>	<ul style="list-style-type: none"> <li>Ex ante and ex post evaluation program – Apr 2021</li> </ul>
<b>Recommendation 16 – BETTER PRACTICE: <i>SRA should communicate the results from the impact assessments to stakeholders using clear, simple language in its annual report and levy-payer magazines using case studies and time-series.</i></b>		
<b>SRA agrees with this recommendation.</b>	<ul style="list-style-type: none"> <li>SRA will seek to simplify its language when reporting the results from impact assessments in its six-monthly impact pathway reports, annual performance reports and annual reports.</li> <li>SRA will also report on its impact assessments more broadly through the use of case-studies and time-series in its industry publications, including quarterly <i>CaneConnection</i> and <i>Milling Matters</i> newsletters.</li> </ul>	<ul style="list-style-type: none"> <li>Reports and publications – ongoing</li> </ul>

Other findings and/or suggested improvements mentioned in the Independent Performance Review Report		
FINDINGS / SUGGESTED IMPROVEMENTS	ACTIONS	MILESTONES
<p><i>“QDAF has some concerns about its engagement with SRA as it seeks a more collaborative approach to RD&amp;A priority setting and project selection.” (p.7 and p.56)</i></p> <p><i>“Given QDAF’s unique and substantial status as a funding partner, we believe that SRA should be more vigorous in seeking ways to afford QDAF greater influence in the investment of its funding contributions.” (p.56)</i></p>	<ul style="list-style-type: none"> <li>SRA will work/consult more closely with QDAF to identify the Department’s sugarcane RD&amp;A objectives and consult on potential core and contestable projects that align with the Department’s objectives. This will include consulting at an earlier stage with QDAF in the setting of SRA’s RD&amp;A priority investment concepts, project calls and/or commissioning of projects and project selection.</li> </ul>	<ul style="list-style-type: none"> <li>Scheduled consultation with QDAF as part of investment project identification and selection process – ongoing</li> </ul>
<p><i>“SRA’s high fixed costs mean that it has reduced opportunity to invest in contestable projects as revenues decline, and reduced agility to respond to changing priorities.” (p.22)</i></p>	<ul style="list-style-type: none"> <li>SRA is undertaking a comprehensive review of its operating model, including options to reduce fixed costs related to owning and operating eight regional research stations and head office, laboratories and quarantine facilities at Indooroopilly, Brisbane.</li> <li>A transition plan will be developed for implementing SRA’s new operating model, including any divestment and/or rationalisation of SRA’s fixed assets.</li> </ul>	<ul style="list-style-type: none"> <li>New operating model transition plan – March 2021</li> </ul>
<p><i>“...while current directors have a high level of financial literacy, the Board would benefit from the addition of a finance specialist.” (p.26)</i></p>	<ul style="list-style-type: none"> <li>SRA has a skills-based Board, with an independent Director Selection Committee appointed annually to conduct the selection process for new directors.</li> <li>Board annually reviews and publicises the skills and experience needed for the SRA Directors and provides the skills matrix to the Director Selection Committee each year. The skills matrix includes <i>“finance and business</i></li> </ul>	<ul style="list-style-type: none"> <li>Director Selection Committee convened – Apr 2021</li> </ul>

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	<p><i>management Executive and/or Board experience in financial accounting and reporting, risk and internal controls”</i></p> <ul style="list-style-type: none"> <li>The Board must appoint Audit &amp; Risk Committee members on the basis of their skills and experience, so that collectively the Committee has the appropriate skills and experience to fulfil its role, functions and accountabilities. ARC members do not need to be Directors and specialist finance advice can also be sought by ARC.</li> </ul>	
<p><i>“...SRA is likely to need a comprehensive implementation plan to manage potentially significant change to its operations. This would need to include an active communication strategy for staff and stakeholders.” (p.32)</i></p>	<ul style="list-style-type: none"> <li>A transition plan will be developed for implementing SRA’s new strategy and operating model, including a communication strategy and revised Engagement Framework covering staff, levy payers, government investors, research providers and other key stakeholders, such as extension providers and productivity services organisations.</li> </ul>	<ul style="list-style-type: none"> <li>New operating model transition plan – March 2021</li> </ul>
<p><i>“...the structure of the 2018/19 (performance) report is very good and consideration should be given to continuing with this approach.” (p.37)</i></p>	<ul style="list-style-type: none"> <li>SRA publishes an annual Performance Report to provide a snapshot of key RD&amp;A outputs, impact assessments and progress against strategic and operational plan key performance indicators.</li> <li>SRA will continue to enhance the report contents and maintain the streamlined format of the 2018/19 report in future iterations of the report.</li> </ul>	<ul style="list-style-type: none"> <li>COMPLETED – Annual Performance Report – Oct 2020</li> </ul>
<p><i>“The impact pathway reports are all particularly useful documents, but with a diverse target market (all</i></p>	<ul style="list-style-type: none"> <li>SRA will continue to enhance the six-monthly impact pathway reports and maintain the more streamlined format of the December 2019 report in future iterations of the report.</li> </ul>	<ul style="list-style-type: none"> <li>Impact Pathway Report – Dec 2020</li> </ul>

Other findings and/or suggested improvements mentioned in the Independent Performance Review Report		
FINDINGS / SUGGESTED IMPROVEMENTS	ACTIONS	MILESTONES
<i>stakeholders) the more summarised December 2019 format is probably the more generally palatable.” (p.38)</i>		
<i>“There is more equivocal support for elements of soil health, nutrient management, plant health, water use, harvesting and so on. Some stakeholders believe there needs to be a review of the whether it is still appropriate to maintain core investments in these areas, or whether procurement through the hybrid contestable model may deliver greater benefits to cane growers. This question should form part of the current strategy and operating model review.” (p.47)</i>	<ul style="list-style-type: none"> <li>SRA is undertaking a comprehensive review of its strategy operating model, including its current and future internal research capability requirements, particularly in areas where there is external research capability.</li> </ul>	<ul style="list-style-type: none"> <li>Development of new strategy and operating model – Dec 2020</li> <li>New operating model transition plan – Feb 2021</li> </ul>
<i>“...summary (independent impact assessment) reports should be made available on the website.” (p.63)</i>	<ul style="list-style-type: none"> <li>SRA provides a summary of completed independent impact assessments in its published six-monthly impact pathway reports and annual performance reports.</li> </ul>	<ul style="list-style-type: none"> <li>Summarised impact assessment reports published on website – ongoing</li> </ul>

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	<ul style="list-style-type: none"> <li>SRA will also provide summarised, plain-english, extracts of the independent impact assessment reports on SRA's website shortly following receipt of the reports.</li> </ul>	



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