

PROJECT PHOENIX



**VOICES FROM THE
AUSTRALIAN NATIVE
SEED SECTOR
PUBLIC CONSULTATION REPORT**

AUGUST 2021

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Project Phoenix is supported by the Australian *Government’s Wildlife and Habitat Bushfire Recovery program* and co-ordinated by Greening Australia.



Australian Government



Across all of our Project Phoenix activities and actions we pay respect to the Traditional Owners and Custodians of the lands and waters on which we work. We honour the resilience and continuing connection to country, culture and community of all Aboriginal and Torres Strait Islander people across Australia. We recognise the decisions we make today will impact the lives of generations to come.



"This opportunity to give structure to the Native Seed Industry may not come again and for this reason decisive action needs to be taken."

(Seed collection business owner)

"The seed sector is filled with passionate and very knowledgeable practitioners; removal of barriers and creating a more interconnected sector, with a strong voice and agreed standards will enable businesses (old and new) to grow and meet future demand."

(Natural Resource Management practitioner)

"As a precious resource, seed resources must be protected against unsustainable harvesting, and mechanisms should be in place to ensure minimal seed wastage from remnant populations."

(Seed collector and Indigenous plant nursery worker)



ACKNOWLEDGEMENTS

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PUBLIC CONSULTATION AT A GLANCE

Support for the *Strategy*

- Overall **support** for the *Strategy* is **strong**.
- No **contentious** issues arose and no additional themes were identified from the *Strategy* submissions.
- Some submissions raised historical issues such as the viability of seed collection and profit margins for seed collectors.
- **Indigenous communities** were raised in several submissions as they play a central role in native seed collection and landscape restoration.
- Overall there was support for some type of **industry body** with representation from all parts of the native seed sector.
- **Sector leadership** was considered the most important category by a considerable margin, followed by **Sector communication and networking** and **Information and knowledge**.

Submissions

- A total of **77** submissions were received.
- **Sixty-three** submissions were received for the *Strategy*: **51** via the online survey and **12** via email.
- **Fourteen** submissions were received for the *Code of Practice*: **13** via the online survey and **one** via email.

Respondents

- **Twenty-six** *Strategy* submissions were from **organisations** and **37** were from **individuals**.
- Over a third of the submissions (**37%**) were from **practitioners**.
- Another **17%** of submissions were from **national organisations and associations**.
- A further **16%** of submissions were from the **community** (including farmers, landholders, Landcare and community members).

National and international responses

- **New South Wales (25), Victoria (14) and Western Australia (10)** had the most submissions with no submissions received from the Northern Territory.
- **One submission** was made by an individual from the **United States Department of Agriculture Forest Service**, who was previously part of the strategic engagement for Project Phoenix.

Project Phoenix resources

- There were **433** downloads of the draft *Strategy* and *Code of Practice* during the public consultation process.
- There were **1,204** downloads of the Project Phoenix resource reports during the public consultation period.

Media and social media engagement

- **163** media contacts received the *Strategy* on press release day one of the public consultation.
- **536,150** people saw the Facebook ads and this resulted in **2,864** people following links associated with the project.
- **156,009** people saw the LinkedIn campaign, resulting in **184** clicks.

1 EXECUTIVE SUMMARY

This report is a summary of the public consultation for *A Strategy for the Australian Native Seed Sector (Strategy)* and *Do we need a National Seed Code of Practice? (Code of Practice)* that will be submitted to the Commonwealth for endorsement. It highlights the value added to Project Phoenix and the *Strategy* by taking the time to listen, learn and build an evidence base from the planning and communication work done for the public consultation.

In developing the Project Phoenix resources, it emerged that there was a need for broad, inclusive and targeted sector engagement to ensure that all those who are part of the native seed sector had an opportunity to contribute to the *Strategy*.

The voices of practitioners, seed merchants, academics, Indigenous businesses, government officials and industry associations are all equal in a public consultation process. As such, Greening Australia requested a four-week public consultation period within the Deed of Variation as part of the project extension negotiation with the Commonwealth.

The public consultation ran from 5 July–2 August 2021 and has now been completed. The timing was ideal. It maximised opportunities for submissions as it was not within a high activity period for many such as Spring, Summer or Autumn.

1.1 Public consultation submissions

The Project Phoenix Public Consultation report provides detailed information on the results of the consultation and the work that was undertaken to inform and support the process. It provides details and outlines the Project Phoenix resources publication process, design of the online survey and submission process, data and analytics, and the communications that were conducted concurrently with the planning for the online submission portal on the Greening Australia website.

Project Phoenix received the following submissions:

	SUBMISSIONS VIA ONLINE SURVEY	EMAILED OR MAILED SUBMISSIONS	TOTAL SUBMISSIONS
<i>Australian Native Seed Strategy</i>	51	12	63
<i>Code of Practice</i>	13	1	14
Total			77

1.1.1 Design and development of the survey questions

Survey questions were in plain English and limited to five for the draft *Strategy* and three for the draft *Code of Practice* with a simple Yes/No response and space for free text to encourage concise responses.

1.1.2 Online submissions on the Strategy

Of the **63** responses, there were **51** responses through the online survey on the *Strategy*, with **26** in total from **organisations** and **37** from **individuals**.

1.2 Written submissions on the *Strategy*

Of the **12** written submissions received, **nine** were from **organisations** and **three** were from **individuals**.



No contentious, new or emerging themes were identified.

1.2.1 Respondent analysis

Submissions were characterised either as a **self-identified individual** or **organisation** and were classified into the following categories.

STRATEGY SUBMISSION CATEGORY	ONLINE	EMAIL	TOTAL	%
Practitioner	21	2	23	37
National organisations and associations	6	5	11	17
Community	10	0	10	16
Government	5	2	7	11
Related expertise	5	1	6	10
Mining	2	1	3	5
Indigenous	1	1	2	3
International	1	0	1	2
Total	51	12	63	100

1.2.2 Range of submissions

Sixty-three submissions were received and, while this may be considered a small response, a further breakdown of the sub-categories illustrates the breadth of participation of the native seed sector.

SUBMISSION SUB-CATEGORIES			
PRACTITIONER	COMMUNITY	NATIONAL ORGANISATIONS AND ASSOCIATIONS	GOVERNMENT
Nursery	Landholder	Not-for-profits	State government
Native seed collector	Farmer	National associations	Conservation seedbanks
Native seed producer	Community member		Local government
Restoration	Landcare		Training
Seed merchant			
RELATED EXPERTISE	MINING	INDIGENOUS	INTERNATIONAL
Landscape architect	Individuals employed in mining	Associations	USA, individual employed in government
NRM Consultant	Mining Associations	Nurseries	
Agronomists		Seed collectors	
Forestry			
Research			

Over a third of the submissions (**37%**) were received from **practitioners** in the following categories:

- nurseries
- native seed collectors
- native seed producers
- restoration and
- seed merchants.

Another **17%** of submissions were from **national organisations and associations**:

- not-for-profits and
- national associations.

A further **16%** of submissions were from the **community**:

- landholders
- farmers
- community members and
- Landcare.

1.2.3 National and international participation

New South Wales (25), Victoria (14) and Western Australia (10) had the most submissions with no submissions received from the **Northern Territory**. **One** submission was made by an individual from the **United States Department of Agriculture, Forest Service** who had previously been part of strategic conversations with the Project Manager, Project Phoenix, as part of the strategic engagement process.

SUBMISSIONS	ONLINE	EMAIL	TOTAL
NSW	20	5	25
VIC	12	2	14
WA	8	2	10
SA	4	1	5
QLD	3	0	3
TAS	3	0	3
ACT	0	2	2
NT	0	0	0
International	1	0	1
National total			63

1.2.4 Indigenous participation

Two submissions were received from Indigenous organisations. While this appears to be a low level of participation, there were issues with the ways to best engage with the sector due to the national COVID-19 outbreaks. The Project Phoenix Team sought advice from the NSW Indigenous Chamber of Commerce that had worked on one of the Project Phoenix Activities to ensure that communication materials were appropriate and inclusive.



In addition, the Indigenous Land and Sea Corporation (ILSC) that is a member of the Project Phoenix External Steering Committee, Greening Australia’s Reconciliation Action Plan lead (WA) and Greening Australia’s Indigenous Engagement Coordinator for the Reef Aid Program (QLD) supported the *Strategy’s* distribution to Indigenous organisations.

1.2.5 Industry engagement in the public consultation

The Project Phoenix Team actively engaged with the sector at a national level by contacting a range of participants to highlight the public consultation process.

This led to **14** submissions being received from organisations that may not have known of the *Strategy* without direct contact. Where direct contact by phone was made, there was a high level of engagement and appreciation for the phone call.

1.2.6 *Informing the Native Seed Sector — Project Phoenix resources*

Project Phoenix engaged Puddingburn Publishing Services, who are experts in publishing including Word, proofreading, editing and indexing, and Kerry O’Flaherty Design for covers and Project Summaries.

Forty-six documents informed the public consultation process as a direct outcome of the **30** Project Phoenix Activities, including reports, surveys and research projects.

1.2.7 *Building sector capacity and knowledge*

The Project Manager took an innovative approach that valued the authenticity of each author’s voice and their approach to the project. Design decisions were made to unify the suite of resources:

- The publishers designed a Word template for both the summary documents and full reports that would ensure visual consistency regardless of the content.
- Using Word rather than design software provided the Project Team with the capacity to make changes after publication if a need arose quickly, efficiently and at no additional cost, with effective version control in place.
- Adult learning techniques, such as consistent styles for key facts and messages within the reports, provided reinforcement of the content, while table formatting and boxed recommendations made it easy for the reader to review the information in sections or cross reference to other reports.
- Project Phoenix Activity Completion Reports were reimagined as Project Summary documents that were short, sharp and easy to read for those who may be time poor. This approach was very efficient for the Project Team to do and has been very popular with viewers.¹

1.2.8 *Public consultation communications*

The focus of the consultation period was to engage as many people as possible to improve their awareness of the *Strategy* and understanding of the submission process with the ultimate goal of encouraging the **maximum number** of submissions. The Project Phoenix public submission page and Project Phoenix Resource page were key tools in achieving these outcomes.

In the four-week period, the submission page was visited **998** times by **827** people and the Project Phoenix Resource page was visited **892** times by **765** people. The average time spent on the submission page was **5.47** minutes which aligns with the goal of the online portal, which was to enable busy people to make submissions in a time efficient way.

These outcomes validate the design decisions that were made by the Project Phoenix Team and also provide valuable evidence for future consultations that may be required for the *Strategy* implementation moving forward.

¹ Subsequent positive feedback from the public consultation process has validated this approach.

1.2.9 *Social media campaign*

The social media campaign focused on two main platforms — Facebook and LinkedIn — as well as organic posts across the Greening Australia channels. Two concurrent campaigns were run on Facebook, the first one to highlight, raise awareness of the *Strategy* and encourage submissions. The second was focused on engaging the community with the Project Phoenix resources to build sector capacity and to raise the profile of native seed management in Australia.

The Facebook ads were seen **536,150** times and resulted in **2,864** people following links associated with the project.

A campaign was also run on LinkedIn with a stronger professional focus. On LinkedIn, the highest engagement was from the Government Administration category. The LinkedIn ad was seen by a total of **156,009** people resulting in **184** clicks.

2 NEXT STEPS

The public consultation process showed that *A Strategy for the Australian Native Seed Sector* was widely supported and no new themes were identified. There have been some minor amendments to enhance clarity and elevate the role of Indigenous communities in the development of the native seed sector. The document has been updated and will be provided by Project Phoenix to the Commonwealth for approval in August 2021.

The document *Do we need a National Seed Code of Practice? (Code of Practice)* has been updated with an Executive Summary that outlines the input from the native seed sector. **Fourteen** responses were received although some of the *Strategy* comments did include references to the *Code*. There are a variety of different views and further discussion with stakeholders at the national level is required. This is due to the potential implications for licensing or other regulatory reforms that may be undertaken.



It is anticipated that should an industry body be established as an outcome of the *Strategy* consultation, further work can be undertaken on the most effective way that a *Code* could work by addressing it as a policy issue with states and territories in the first instance to establish if it's a viable national option.

The updated documents are available on the Project Phoenix resources page.

3 PUBLIC CONSULTATION REPORT

3.1 Submissions on the *Strategy*

Of the written submissions received, **nine** were from **organisations** and **three** were from **individuals**. **No contentious, new or emerging themes** were identified.

The Australian Seed Federation, the peak body for the agricultural seed industry, suggested that it has the governance structure, Code of Practice and expertise to take on a greater role in representing the native seed sector.

Almost all of the written submissions were supportive of the *Strategy* and reiterated challenges in the native seed sector which are raised in the *Strategy*. Many made a range of suggestions for the implementation of the *Strategy*, as well as suggestions to amend the wording of the *Strategy* itself.

Several of the written submissions highlighted the central role that **Indigenous communities** play in native seed collection and landscape restoration and recommended that the *Strategy* reflect this more strongly.

One submission, from a large supplier of native seed to the mining industry, was not supportive of the *Strategy*, arguing that it is a one-size-fits-all solution, “for large scale commercial seed suppliers and micro-scale community seed suppliers and everything in between”. The submission proposed that larger organisations supplying seed to the mining industry have different needs and goals to smaller scale operators supplying seed to government, and different solutions should be proposed for each group.

3.1.1 *Online survey for the Strategy*

Of the survey responses, **17** were from **organisations** and **34** were from **individuals**.

Support for the *Strategy* was **strong** with most survey respondents, **35** out of **51**, stating that they thought the *Strategy* would be able to deliver to the sector the benefits mentioned in the Survey.

However, **11** out of **51** respondents were unsure whether the *Strategy* would provide the sector with the specific benefits, while **three** out of **51** respondents did not believe the *Strategy* would be able to do so.

Some respondents expressed doubt about whether the *Strategy* would receive adequate funding from government to be able to deliver benefits to the sector. This may be due to historical funding patterns. Others were unsure whether the *Strategy* would be able to address various challenges in the sector such as inadequate profit margins for seed collectors.

When nominating the **three most important categories** for the native seed sector, **Sector leadership** was the category ranked by far the most important overall, with **Sector communication and networking** and **Information and knowledge** next in line.

3.1.2 Implementing the Strategy

There was no clear view as to who should implement the *Strategy*.

Responses varied for the question of **who should be responsible for implementing the Strategy**. The overall trend was that some type of industry body should be responsible, with representation from all parts of the native seed sector. There was no clear view on whether the organisation should have government or no government representation on it. Some respondents felt that it should be autonomous from government.

Some respondents explicitly stated that a new industry body should be formed, whereas others felt that specific existing organisations could take on the role of industry body, or form partnerships and work together.



A common view was that it is important that the industry body or coordinating body should include practitioners from the field.

A handful of respondents felt that a government body should be responsible for implementing the *Strategy*, some nominating specific government bodies.

As in the written submissions, a few survey respondents also emphasised that **Indigenous communities** are an important part of native seed collection and landscape restoration and asked that the *Strategy* be amended to reflect this.

3.1.3 National Seed Code of Practice

There were **13** responses to the online survey on the *Code of Practice* and **one** written submission. Of these, **six** in total were from **organisations**, and **eight** were from **individuals**.

3.1.4 Written submission on the Code of Practice

The written submission on the *Code* was supportive of a *Code of Practice* and proposed that any future *Code* should be voluntary at first, and that it would best be based on existing codes and frameworks, citing the RIAWA system as one that has been road-tested. Regarding who should manage a *Code of Practice*, the submission proposed that it be managed by a new body representative of different parts of the sectors being brought together — regulators, practitioners, collectors, researchers, conservationists and Indigenous groups.

3.1.5 Online survey on the National Code of Practice

An overwhelming majority of respondents were **supportive of a National Code of Practice**. When asked in the survey whether they thought a national *Code of Practice* was a good idea, **11** out of **13** answered **Yes**, with **two** respondents answering **No**. Regarding whether the *Code of Practice* should be **voluntary or mandatory**, a majority of the survey respondents, **nine** out of **13**, stated that it should be voluntary.

Respondents were asked whether a potential new *Code of Practice* should be **based on one or more** existing codes of practice, or whether **a new Code should be created**. Again, most respondents (**9** out of **13**) replied that it should be based on one or more of the existing codes of practice.

However, the comments made by some respondents who had replied that a new *Code* should be created, indicated that despite their answer, they felt that existing codes or frameworks should be used as a basis for a new *Code of Practice*.

Regarding the question of **who should manage the Code of Practice**, the responses were consistent with those for the *Strategy* survey. There was a clear trend that a coordinating body should manage the *Code*, comprising representatives from all parts of the sector. Answers varied as to the exact make-up of the coordinating body. Some respondents explicitly called for the formation of a new industry body, while others proposed that one or more existing organisations take on this role.

3.2 Project Phoenix resource reports

A total of **1,204** Project Phoenix resource reports were downloaded from the website during the consultation period (5 July–2 August 2021). This is an outstanding response and the positive feedback from the sector on the quality, breadth, relevance and capacity building of the resources is validation of the scope of the Activities and their direct relevance to the native seed industry.

Most importantly, the sector now has data, information and capacity to communicate, inform and collaborate as an industry moving forward.

There were **433** downloads of the draft *Strategy* and *Code of Practice* as shown below. These were also the **three** key documents for the public consultation process.

ACTIVITY NUMBER	DOCUMENT NAME	TOTAL DOWNLOADS
3.01 — Summary	<i>A Strategy for the Australian Native Seed Sector (draft) — summary</i>	191
3.01 — Full Report	<i>A Strategy for the Australian Native Seed Sector (draft)</i>	162
2.07 — Full Report	<i>Do we need a National Seed Code of Practice?</i>	80
Total		433

There were **235** downloads of the top **five** Project Phoenix resource reports:

ACTIVITY NUMBER	DOCUMENT NAME	TOTAL DOWNLOADS
4.1 and 4.2 — Summary	<i>The Big Reveal — Introducing the New FloraBank Website</i>	57
2.2 — Summary	<i>Join the National Seed Network!</i>	56
2.01 — Summary	<i>Snap! A Picture of the Australian Seed Sector in 2021</i>	50
1.01 — Summary	<i>Bushfire Impacts — ArcGIS Resources</i>	37
2.4 — Summary	<i>Australian Native Seed Production in 2021</i>	35
Total		235

3.3 Project Phoenix resources

On completion of the projects, Project Phoenix moved from the internal to the external phase of project management that required an understanding of the audience who would be reading and utilising the resources and also actively contributing to the public consultation process for the draft *Strategy* and *Code of Practice*.

4 ADAPTIVE COMMUNICATIONS

4.1 Analysis

The focus of the consultation period was to engage as many people as possible to improve their awareness of the *Strategy* and understanding of the submission process with the ultimate goal of encouraging the **maximum number** of submissions. The Project Phoenix public submission page and Project Phoenix resource page were key tools in achieving these outcomes.

In the four-week period, the submission page was visited **998** times by **827** people and the Project Phoenix resource page was visited **892** times by **765** people. The average time spent on the submission page was **5.47** minutes which aligns with the goal of the online portal, which was to enable busy people to make submissions in a time-effective way.

This is validation of the design decisions that were made by the Project Phoenix Team and also provides valuable evidence for future consultations that may be required for the *Strategy* moving forward.

4.2 Location data

The location of people accessing the submission page indicates high numbers in capital cities and a pleasing component of international interest. That trend was also reflected in the Project Phoenix resource page data.

PROJECT PHOENIX SUBMISSION PAGE TOP SEVEN LOCATIONS — WEEKS 1–4	
CITY	PAGEVIEWS
Sydney	316
Melbourne	178
Canberra	137
Perth	89
Adelaide	56
Brisbane	45
United States of America	40
Total	861

Greening Australia website analytics

PROJECT PHOENIX RESOURCE PAGE
TOP SEVEN LOCATIONS — WEEKS 1–4

CITY	PAGEVIEWS
Sydney	292
Melbourne	145
Perth	109
Canberra	95
Brisbane	85
Adelaide	33
United States of America	24
Total	738

Greening Australia website analytics

4.3 Social media campaign

The social media campaign focused on two main platforms — Facebook and LinkedIn — as well as organic posts across the Greening Australia channels to support the native seed sector. Two concurrent campaigns were run on Facebook, the first to highlight, raise awareness of the Strategy and encourage submissions. The second was focused on engaging the community with the Project Phoenix resources to build sector capacity and to raise the profile of native seed management in Australia.

The Facebook ads were seen by **536,150** and resulted in **2,864** people following links associated with the project.

A campaign was also run on LinkedIn with a stronger professional focus. On LinkedIn, the highest engagement was from the Government Administration category. The LinkedIn ad was seen by a total of **156,009** people resulting in **184** clicks.

4.4 Communications analysis

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