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Department of Biodiversity,
Conservation and Attractions

Draft *Santalum spicatum* (Sandalwood) Biodiversity Management Programme

October 2022



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Front cover photo: Mature sandalwood, Goldfields Region.

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Acknowledgement

The Department of Biodiversity, Conservation and Attractions (DBCA) acknowledges the Wongai, Yamatji and Noongar Peoples as the first sandalwood custodians and the traditional owners of the lands and deserts from where sandalwood originated and thrived. We respect the connection and knowledge of their Elders past, present and emerging.

Introduction

Santalum spicatum (sandalwood) is variously known as birdilyba, kirti, munyunpa, parnjaj, pikarra, tarrtjanpa, tatjan, tujan(pa), thumbuny, walarda, walku, warlka, wirawayin (GALCAC, 2022), uilarac, waang, willarak, wolgol, wollgat (Abbott, 1983), poilyenum (Bindon and Chadwick, 1992)¹, native sandalwood or Western Australian sandalwood.

Sandalwood is a slow-growing, long-lived small woody tree or shrub that is one of 25 known species of the *Santalum* genus, and one of four that is indigenous to Western Australia. Sandalwood extends across the southern semi-arid and arid regions of Western Australia and South Australia. 'Wild' sandalwood refers to populations of sandalwood growing among naturally established native vegetation; and 'plantation' sandalwood is cultivated sandalwood specifically grown on previously cleared land as a commercial crop.

Within Western Australia, the sandalwood distribution is across 173 million hectares of the Wheatbelt, Goldfields, Murchison, Gascoyne and southern Pilbara regions, that is the Country of 80 or more Aboriginal Clans on lands now classified as either Crown or private (Appendix 1). These lands are managed for purposes that include conservation, mining, pastoralism and the use and benefit of Aboriginal People.

Sandalwood is economically valuable and is commercially harvested for the aromatic oils contained in the heartwood. As the heartwood extends throughout the tree, the whole tree (including roots) is removed (taken) and processed.

The key considerations for the conservation, protection and management of wild sandalwood are:

- limiting the species' decline and promoting recovery;
- ecological sustainability accounting for pressures on recruitment and population survival; and
- demand for continued social sustainability objectives from sandalwood, including economic opportunities for Aboriginal communities.

Purpose

In accordance with Part 5 of the *Biodiversity Conservation Act 2016* (BC Act), the purpose of this *Santalum spicatum* (Sandalwood) *Biodiversity Management Programme* (Programme) is to provide for the conservation, protection, and management of wild sandalwood. Within the Programme's first five-year review timeframe, the intention is to establish meaningful objectives, strategies and actions that will seek to stabilise wild populations through conservation and ecologically sustainable use criteria. This will be achieved through information gathering, identifying and mitigating threats, regeneration processes, and limiting harvest quantities.

¹ Phonetic spelling may vary. This is not an exhaustive list of sandalwood names.

The Programme applies to the management of wild sandalwood on both Crown and private lands across Western Australia. Management actions proposed under the Programme are specific to the management of wild sandalwood and are in addition to routine activities undertaken by DBCA. The Programme does not apply to plantation sandalwood, Indian sandalwood (*Santalum album*) or other *Santalum* species.

Public authorities (including State Ministers, State Government departments, State statutory authorities and local governments) must, to the extent that their functions relate to the matters dealt with in a biodiversity management programme, have regard to the Programme when performing those functions.

Legislative framework²

State legislation

Sandalwood is defined and controlled as a native species by the BC Act and *Biodiversity Regulations 2018* (BC Regulations). Licences regulate the take of forest products, seeds, flowers and leaves from both living (green) and dead sandalwood trees. Once taken, sandalwood of a specific size is regulated as specifically controlled sandalwood, and its transport requires a sandalwood tracking form. Supply, processing, dealing and export is regulated by licence.

Sandalwood may also be lawfully taken (or cleared) in Western Australia under Parts IV and V of the *Environmental Protection Act 1986* (EP Act) and the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004* (Clearing Regulations). A licence issued under the BC Regulations provides an exemption to the requirement for an EP Act native vegetation clearing permit (clearing permit).

Sandalwood is also a *forest product* for the purposes of section 4 of the *Forest Products Act 2000* (FP Act). Therefore, a production contract may be entered into with the Forest Products Commission (FPC) that enables entry to pastoral leases and other 'public land'³ and the authority to take or remove sandalwood. An FP Act production contract provides an exemption from the requirement for a clearing permit. The FPC is licensed by DBCA to supply sandalwood under the BC Regulations.

Currently, the take quantity (quantity of wild sandalwood that may be authorised to be taken in any year) is limited by the *Sandalwood (Limitation on Removal of Sandalwood) Order (No. 2) 2015* (Sandalwood Order). The take quantity specified in the Sandalwood Order was set on advice from the Minister for Environment and approved by the Governor in Executive Council in 2015 under the now repealed *Sandalwood Act 1929* (Sandalwood Act).

² Legislation disclaimer

Discussion and mention of legislation throughout this document is intended for overview and to provide context to proposed management actions. Legislation excerpts are not complete or verbatim. Readers should refer to the legislation for reference in the first instance and exercise their own skill and care in the use of the material.

³ 'Crown land' is defined by the *Land Administration Act 1997*. 'Public land' is a sub-set of Crown land and defined in the FP Act. 'Crown land' and 'public land' are not interchangeable terms. Crown land includes all public land.

The Sandalwood Order continues to have effect under the BC Act and transitional arrangements in place in the BC Regulations. Regulation 173 provides that: 'The sandalwood order is, in relation to sandalwood other than cultivated sandalwood, taken to be an order made by the Minister under section 187(2) of the Act in relation to the species *Santalum spicatum*.'

Under section 187 of the BC Act future sandalwood quantities that may be taken will be established by order made by the Minister, published in the *Government Gazette* and laid before Parliament. This order is subject to disallowance by Parliament.

The Programme is prepared under Part 5 of the BC Act and provides for the management of sandalwood as a native species. It addresses matters of 'ecologically sustainable use' defined as: 'use of the biodiversity components in a way and at a rate that does not lead to the long-term decline of biodiversity, thereby maintaining the potential of the biodiversity components to meet the needs of present and future generations.'

The Programme applies to wild sandalwood occurring on lands to which the *Conservation and Land Management Act 1984* (CALM Act) applies, and all other Crown and private lands as summarised in Table 1. The management of wild sandalwood on DBCA managed land (i.e. categories 1 and 2 in Table 1) will additionally be subject to the CALM Act and management plans made under that Act.

Table 1 Land tenure within the Western Australian geographic distribution of sandalwood as of March 2022.

Category	Land tenure	Hectares ('000)	% of area
1	Nature reserve and national park	12,085	7%
2	Other DBCA managed lands (including state forest, timber reserve and conservation park)	715	<1%
3	DBCA interest lands (mostly former pastoral lease managed for conservation)	6,236	4%
4	Other Government purpose lands	11,989	7%
5	Unallocated Crown land	58,443	34%
6	Crown lease predominantly for pastoral purposes	67,404	39%
7	Private property and other	16,338	9%
All	Total of all tenures	173,211	100%

The Programme does not address management of industries that use sandalwood and other non-biodiversity matters including Aboriginal heritage, climate change mitigation and economic returns.

Commonwealth legislation

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) provides the legislative framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places, known collectively as matters of

national environmental significance. The EPBC Act applies to actions that are likely to have a significant detrimental impact on a matter of national environmental significance. Sandalwood is not listed as a matter of national environmental significance under the EPBC Act, and therefore taking of sandalwood is not subject to the EPBC Act.

Export licences for sandalwood are issued in accordance with the Commonwealth's *Export Control Act 1982* and are subject to any associated conditions.

The *Native Title Act 1993* provides for the recognition of native title rights and interests and establishes ways in which future dealings affecting native title may proceed.

Sandalwood biodiversity

Biology

Sandalwood typically grows to four metres in height with a stem diameter of 200mm (measured at 150mm above the ground). In Kalgoorlie, the length of time required for a sandalwood tree to attain the minimum stem size permitted for take (approx. 127mm diameter) is 59 to 115 years (Loneragan, 1990).

Sandalwood reproduces through production of fruits consisting of a leathery tan-brown outer skin (epicarp) and a smooth round inner nut (endocarp) (Loneragan, 1990). The endocarp may be 10-25 mm in diameter and weigh 2-3 grams. Seeds are dispersed by the seed caching (scatter hoarding) behaviours of ground-dwelling marsupials including woylies (*Bettongia penicillata ogilbyi*) and boodies (*Bettongia lesueur graii*) (Murphy *et al.*, 2005, Chapman, 2015). Water flow across and through the landscape is also an important seed dispersal and recruitment vector.

Sandalwood is a root hemi-parasite⁴ that requires nitrogen fixing host plants (particularly of the genus *Acacia*) from soon after germination through to maturity. Sandalwood roots connect to host roots through structures called haustoria. Each haustorium can be up to 20mm in length and an individual sandalwood tree can have hundreds of connections. The haustoria function is to supply the sandalwood tree with water and nutrients from its host.

Genome analysis indicates sandalwood has two main genetic groups that are geographically separated, one centred in the northern arid region and the other in the southern semi-arid region (Byrne *et al.*, 2003) that are loosely separated by the 250mm rainfall isohyet that extends from Israelite Bay through Kalgoorlie and Yalgoo to Shark Bay. North of this line (<250mm mean annual rainfall), sandalwood is most associated with *Acacia* shrublands. South of the line (250 to 650mm mean annual rainfall), sandalwood is most associated with *Acacia* dominant understories that occur among the broad *Eucalyptus* woodlands.

Distribution

The Interim Biogeographical Regionalisation of Australia (IBRA) divides the Australian land mass into 89 bioregions and 419 sub-regions. Each region is a land area comprised of a group of interacting ecosystems that are repeated in similar form across that landscape (Thackway and Cresswell, 1995). The sandalwood distribution occurs over the 15 Western Australian IBRA bioregions and 29 sub-regions listed in Table 2 and is illustrated with specimen locations from Florabase in Appendix 1.

⁴ Hemi-parasite: a plant that gains part of its resources through connections with another plant while also photosynthesising.

Table 2 IBRA Western Australian bioregions and sub-regions within the sandalwood distribution.

Bioregion	Sub-regions
Avon Wheatbelt	<ul style="list-style-type: none"> • Katanning • Merredin
Carnarvon	<ul style="list-style-type: none"> • Cape Range • Wooramel
Central Ranges	<ul style="list-style-type: none"> • Mann-Musgrave Block
Coolgardie	<ul style="list-style-type: none"> • Eastern Goldfields • Mardabilla • Southern Cross
Esperance Plains	<ul style="list-style-type: none"> • Fitzgerald • Recherche
Gascoyne	<ul style="list-style-type: none"> • Ashburton • Carnegie • Augustus
Geraldton Sandplains	<ul style="list-style-type: none"> • Geraldton Hills
Gibson Desert	<ul style="list-style-type: none"> • Dune Field • Lateritic Plain
Great Victoria Desert	<ul style="list-style-type: none"> • Central Shield
Little Sandy Desert	<ul style="list-style-type: none"> • Trainor
Mallee	<ul style="list-style-type: none"> • Eastern Mallee • Western Mallee
Murchison	<ul style="list-style-type: none"> • Eastern Murchison • Western Murchison
Nullabor	<ul style="list-style-type: none"> • Carlisle • Nullabor Plain
Pilbara	<ul style="list-style-type: none"> • Chichester • Fortescue • Hammersley
Yalgoo	<ul style="list-style-type: none"> • Edel • Tallering

Sandalwood is culturally, medicinally and nutritionally important to the Aboriginal Peoples with whom the species co-existed for millennia. While the species was historically utilised, traded and shared between communities and nations, it remained prolific under traditional thresholds of ecologically sustainable use.

Current situation

The international economic value of sandalwood was recognised by early non-indigenous settlers who began harvesting and exporting the species in the 1840s (Talbot, 1983). By the 1890s, the economic value of sandalwood to the Western Australian Colony (and later State) prompted extensive and ongoing research and inventory that has informed regeneration processes, conservation prescriptions, take limits and resource yield forecasts.

Since the commencement of Western Australia's European colonisation in 1829, sandalwood occurrences within the bioregions have variably, and in some cases, significantly changed. This is most apparent throughout the Avon Wheatbelt and Mallee where extensive agricultural clearing has reduced wild sandalwood occurrence to fragmented populations within conservation reserves and remnant native vegetation on private property.

While sandalwood still broadly occurs across the Coolgardie, Murchison, Gascoyne and Yalgoo bioregions, population numbers and condition vary considerably due to cumulative impacts associated with:

- land use such as grazing by domestic ungulates;
- pest and feral species;
- lawful and unlawful take;
- altered fire regimes;
- deterioration of soil and water quality; and
- climate change.

Of particular concern is whether the current cohort of sandalwood regeneration is sufficient to replace the projected decline of mature sandalwood plants over the next 50 to 100 years.

Extensive sandalwood seed sowing programs among remnant natural vegetation, including on conservation lands excluded from harvest, is expected to generate a young cohort within sandalwood populations in >250mm rainfall zones. These programs have seen some success and are an important consideration in assessing wild sandalwood population status.

An estimated total of 25,000 hectares of plantation sandalwood has been established in the State, mainly in the Wheatbelt. The plantation resource is at varying stages of maturity.

Objectives and strategies

To stabilise the ecological sustainability of wild sandalwood, the objectives and strategies of this Programme (summarised in Appendix 2) seek to conserve, maintain or re-establish self-sustaining sandalwood ecosystems while providing for an ecologically sustainable level of wild sandalwood use (harvest).

Objective: Manage sandalwood take for ecologically sustainable use.

Strategy 1: Protect and manage sandalwood populations throughout its Western Australian distribution through a Comprehensive, Adequate and Representative (CAR) reserve system.

Australia is a signatory to the United Nations Convention on Biological Diversity (CBD). This multilateral treaty is the international instrument for the conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilisation of genetic resources. To secure long-term protection for Australia's biodiversity in compliance with the CBD, a CAR national reserve system of protected areas is being further developed. The Convention sets a target to conserve and effectively manage at least 17 percent of terrestrial and inland water areas (Department of Climate Change, Energy, the Environment and Water, 2022).

In 1988, Western Australia began building on its existing conservation estate (i.e. CALM Act lands including nature reserves and national parks) to establish a CAR reserve system that aligns with national reserve system goals to develop and effectively manage a comprehensive, adequate and representative national system of protected areas to secure long-term protection for Australia's terrestrial biodiversity. To increase rangeland ecosystem representation, DBCA (through its predecessors), purchased pastoral leases and reconfigured their landscapes from commercial agricultural production to management for conservation.

Initial pastoral lease purchases were funded by the Sandalwood Conservation and Regeneration Project. This initiative was to improve the conservation status of sandalwood in Western Australia, partly through developing and managing an effective reserve system to conserve representative areas of sandalwood. Subsequently, the Gascoyne-Murchison Rangeland Strategy provided for further acquisition of pastoral leases. Through these processes, over five million hectares of pastoral leases located across the Gascoyne, Murchison and Goldfields regions were purchased for conservation, many of which contain sandalwood.

While 19 million hectares of the sandalwood distribution are managed by DBCA for conservation (categories 1, 2 and 3 of Table 1), the Western Australian system of terrestrial conservation reserves does not yet meet the nationally agreed CAR representation in many IBRA sub-regions. Consequently, sandalwood is not adequately or comprehensively represented in reserves.

Native title must be considered in progressing lands into the CAR reserve system. Determined and claimed native title recognises traditional owners' rights to exclusive land possession and in some cases rights to take resources (including sandalwood) for any purpose. As such, native title holders may determine sandalwood management objectives on these lands (within the constraints of the BC Act and the authorised capacity for DBCA to decline to issue sandalwood licences from existing or proposed conservation areas).

Capacity for increasing the size of the CAR reserve system can be diminished by resource development. Mining exploration and extraction activities with the potential to cause disturbance to sandalwood on CALM Act lands can be approved under the *Mining Act 1978* (Mining Act) and EP Act. Specifically, Section 24 of the Mining Act applies to applicants seeking access to CALM Act lands for mining activities (including exploration). Section 24 requires that prior to the Minister for Mines providing consent to mining, the Minister responsible for the reserve must first provide formal recommendations or 'concurrence' for those activities. In some instances, where conservation values are considered to constrain extraction of mineral and petroleum resources, State objectives supporting resource development outweigh conservation values.

Sandalwood on conservation lands in the CAR reserve system is managed for conservation and protected from harvest. The quantity of sandalwood protected from harvest is an important consideration in assessing sustained yield, therefore any activity that can access and disturb sandalwood populations on conservation lands affects the calculations for sustainable harvest and requires active planning and management to mitigate the effect on ecologically sustainable use.

Management actions

- a) *Continue to manage the CAR reserve system for the protection of sandalwood and other conservation values.*
- b) *Progress the reservation of former pastoral leases purchased for conservation under the CALM Act toward the 17 percent target in IBRA bioregions with sandalwood distribution.*
- c) *Work with native title holders and joint management partners to establish and protect sandalwood on lands included in the CAR reserve system.*

Strategy 2: Review and potentially revise lawful sandalwood take quantities to maintain productive capacity of sandalwood populations and associated ecosystems.

The BC Act s187(2) states: 'The Minister may, by order —

- (a) fix the maximum quantity of sandalwood that can be taken in a specified period; and
- (b) fix the maximum quantity of sandalwood that can be taken in a specified part of the specified period.'

The quantity of wild sandalwood that may be pulled or removed from Crown land and private land is restricted by Ministerial order during the period specified in an order. An order does not restrict the quantity of plantation sandalwood that may be taken.

The current Sandalwood Order took effect on 1 July 2016 and continues until 31 December 2026. The order limits the take from Crown land and private land at 'no more than 2500 tonnes in a single financial year, of which no more than 1250 tonnes may be living sandalwood'.

Under section 187(5) of the BC Act the CEO must ensure that the total quantity of sandalwood authorised to be taken under licence does not exceed the maximum quantities set in an order. DBCA regulates the sandalwood take quantity through BC Act licences issued for both Crown and private lands.

Further terms or conditions that are imposed on sandalwood take are prescribed by BC regulation 67. This includes (and is not limited to), the minimum size of living (green) trees that can be taken 'must not be less than 400mm in circumference when measured over bark at a point approximately 150mm above the ground'.

Management actions

- a) *DBCA will determine and recommend a sandalwood take quantity for the Minister to issue an order that will replace the Sandalwood Order in 2027. In limiting the sandalwood take, recommendations will account for:*
 - i. *environmental and social sustainability within the definition for ecologically sustainable use of the BC Act s69(2);*
 - ii. *regional licence protocols for sandalwood conservation, protection and management (to be developed);*
 - iii. *strategic inventory, resource and population modelling;*
 - iv. *scale and effectiveness of sandalwood establishment operations; and*
 - v. *the extent to which a supply of plantation sandalwood may enhance the conservation of wild sandalwood.*

- b) *DBCA will review regulation 67(c) (that prescribes the minimum size permitted for take of sandalwood) and recommend changes if considered necessary to maintain best practice consistent with contemporary species biology and population knowledge.*

Objective: Manage and mitigate threats to sandalwood and sandalwood populations.

Strategy 3: Limit the impact of pests, feral animals and diseases on sandalwood.

Animal pests and feral animals: predators

Several introduced (or feral) predators have become established within the sandalwood distribution and are having significant impacts on sandalwood populations. Feral predators (particularly feral cats and foxes) prey on native fauna and have been linked to the extinction and/or significant decline of the ground-dwelling marsupials that are important for sandalwood seed dispersal and recruitment. For example, in the Coolgardie bioregion, 20 marsupial species that occurred in 1829 are now considered regionally extinct.

Since 1996, fox baiting using 1080 has been carried out by DBCA (and its predecessors) to protect native fauna through the *Western Shield* Program (Possingham et al, 2004). *Western Shield* is one of Australia's largest wildlife recovery programs, aiming to recover and sustain wild populations of native fauna threatened by predation from foxes and feral cats. The program now covers an area of 3.8 million hectares across Western Australia, in lands that include the CAR reserve system within 1.6 million hectares of the sandalwood distribution. Over the last decade, the effect of feral cat predation has become more evident as populations of some threatened species, including the woylie and boodie, that had recovered with fox baiting started to decline. *Western Shield* is now integrating the feral cat bait, Eradicat® with fox baiting to reduce the impact of feral cats on native fauna.

Animal pests and feral animals: herbivores

Feral herbivores, particularly goats and rabbits, are widespread in the sandalwood distribution. These animals voraciously graze sandalwood seedlings and trees; and have considerable impact on vegetation composition, cover and condition that can lead to increased erosion and habitat destruction. Camels, donkeys, horses and pigs are also present in parts of the sandalwood distribution; however, are not considered to cause the same level of impact to sandalwood as goats and rabbits.

DBCA develops control plans to reduce the range and abundance of feral herbivores that are causing significant detriment to conservation values on DBCA managed land; works with neighbours to integrate feral herbivore control measures across property boundaries; and supports the activities of recognised biosecurity groups in controlling declared pests.

Management of water points is a key strategy to reduce grazing pressure and DBCA's approach is generally to remove artificial water points from lands acquired for conservation. Artificial water points enable numbers of introduced and native animals (such as kangaroos) to increase to unsustainable levels in the surrounding environment.

In contrast to the negative impacts of foxes and feral cats, the increased occurrence of wild dogs (including dingoes, feral/escaped domestic dogs and their hybrids, that are declared pests under the *Biosecurity and Agriculture Management Act 2007* (Biosecurity Act)) has caused localised reductions in goat populations that have allowed vegetation recovery and provided sandalwood the opportunity to re-establish.

Both introduced and native species may be declared as pest animals under the Biosecurity Act and managers of any land are required to carry out control measures for 'declared species' under that Act to contain the damage they cause. Control options for pest animals include ground and aerial baiting, shooting, trapping, fencing, biological control, mustering and removal.

Plant pests and weeds

Plant pest and weed infestation in the sandalwood distribution is primarily associated with species introduced through activities related to pastoralism and mining. Many such as buffel grass and ruby dock are now widespread. While not thought to have a direct impact on sandalwood, weed species can add to fire-fuel loads and alter fire regimes in ways that may adversely affect fire sensitive species such as sandalwood. Following the removal of livestock there are many weed species that respond vigorously, particularly in heavily disturbed sites such as near water points and holding yards.

Broadly, DBCA has developed an invasive plant prioritisation process that is an integrated approach to the management of weeds that impact biodiversity. This process provides a ranking of the threat posed by each weed species by region against specific criteria. It aims to consider priorities for control of the threat of environmental weeds within Western Australia based to individual species and more broadly, their impacts on biodiversity assets.

Machinery used for the harvest and haulage of sandalwood has the potential to spread weeds and appropriate hygiene practices are required to minimise this risk.

Diseases

No diseases are currently known to affect wild sandalwood. As a precaution, hygiene measures such as cleaning soil from vehicles and other equipment before performing any work on the conservation estate are required in some areas.

Management actions

- a) *DBCA may undertake additional predator control in locations with known woylie and other sandalwood seed caching marsupial populations within available resources.*
- b) *In land management decisions, DBCA may determine there are locations where wild dog predation of herbivores is more beneficial to native flora conservation than wild dog control measures.*
- c) *DBCA may increase feral herbivore controls in areas with established sandalwood seedlings and saplings, within available resources.*

Strategy 4: Establish sandalwood in locations not grazed by domestic ungulates.

Sandalwood foliage is often preferentially grazed by livestock. Domestic ungulates, particularly sheep and goats, are widespread pastoral livestock across the western portion of the sandalwood distribution. Through grazing and hard-hoof soil compaction, domestic ungulates have had considerable impact on vegetation composition, cover and condition resulting in soil erosion and habitat destruction. Cattle are currently the predominant livestock throughout the pastoral locations of the eastern part of the sandalwood distribution. Cattle are not considered to cause the same level of impact to sandalwood as sheep and goats.

Sheep and goat grazing on seedlings and young plants and has had a major impact on establishment and recruitment of sandalwood for many decades. Prescription of pastoral stock carrying capacity limits and rangeland condition monitoring under the authority of the Pastoral Lands Board has reduced livestock numbers and pressures on soils and vegetation. Where there is any presence of sheep or goats however, there is little opportunity for sandalwood establishment without exclusion fencing.

Rangeland vegetation and soil condition is subject to the provisions of the *Soil and Land Conservation Act 1945*; is the responsibility of the Commissioner of Soil and Land Conservation and administered through the Department of Primary Industries and Regional Development. These provisions include the mitigation and prevention of land degradation, promotion of soil conservation and educating landholders and the public about sound land management.

DBCA has removed livestock from pastoral leases purchased for the CAR reserve system although it is noted that native title holders may desire to reintroduce stock in some locations. This will be further discussed through the development of joint or cooperative management arrangements.

Management action

- a) *In assessing applications to take living (green) sandalwood, DBCA will apply Sandalwood Licensing Guidelines with specific criteria for locations subject to agricultural sheep or goat enterprises.*

Strategy 5: Provide effective compliance and enforcement to combat sandalwood trafficking across the supply chain from the point of origin.

Sandalwood trafficking (unlawful take, illegal harvesting, theft, poaching, smuggling) betrays ecologically sustainable use and is a direct threat to the species. Trafficking has been a particularly significant issue since the early 2000s due to:

- sandalwood's attractive and increasing value;
- perceived low probability of being caught due to the remoteness of the sandalwood distribution;
- some use of sandalwood plantations to launder unlawfully-taken wild sandalwood; and
- previously inadequate deterrent penalties of the repealed Sandalwood Act.

The BC Act provides contemporary legislation to better protect the species and support its ecologically sustainable use. Maximum penalties for the unlawful take, supply, dealing in, processing and export of sandalwood are \$200,000 for an individual person, and \$1 million for a business or corporation. In addition, a court may order an offender to pay an additional penalty amount of \$20,000 per tonne (or part of a tonne) of sandalwood involved in the offence.

Compliance and enforcement of sandalwood licences and take is the responsibility of DBCA. The FPC administers FP Act production contracts for public land operations and manages the compliance responsibilities of contractors.

Management actions

- a. DBCA will maintain and, if resources permit, increase wildlife (sandalwood) enforcement operations.*
- b. DBCA will continue to undertake compliance and enforcement action to protect sandalwood and support ecologically sustainable use consistent with the provisions of the BC Act.*
- c. Industry harvest returns and the licensee and production contract supply chains may be audited.*

Strategy 6: Use and respond to fire to mitigate the impact on sandalwood populations.

Although fire is an endemic event in the Australian landscape, it has the potential to impact biodiversity conservation values. Fire impact is determined by a combination of frequency, intensity, interval, season and size.

Sandalwood is highly susceptible to fire with exposure to moderate to high intensity fire events; or repeated short return fire intervals, resulting in tree mortality.

While the differing vegetation types associated with sandalwood have different fire behaviours and responses, woodland communities appear to burn much less frequently than shrubland or mallee communities due to the widely spaced trees and discontinuous ground fuels, with fire intervals of hundreds of years in some areas. However, recent decades have seen bushfires impact approximately 25-30 percent of eucalypt woodland area (Gosper *et al.*, 2013) and their sandalwood populations. Woodland recovery after bushfire can take hundreds of years (Gosper *et al.*, 2013). Anthropogenic induced climate changes are forecast to lead to increasingly frequent and larger fires, often in milder weather conditions (Burrows *et al.*, 2006).

Under a Memorandum of Understanding (MoU) with the Department of Planning, Lands and Heritage (which has legislative responsibility for management of unallocated Crown lands), fire management responsibilities on unallocated Crown lands (UCL) outside townsites are shared between DBCA and local government authorities (LGAs). DBCA is responsible for fire mitigation, and LGAs, with assistance from the Department of Fire and Emergency Services (DFES), are responsible for suppression of bushfires. DBCA is responsible for all aspects of fire management, including prescribed burning and bushfire suppression, on CALM Act lands while traditional owners, pastoralists, mining companies and other private landowners and leaseholders undertake fire management on lands for which they are responsible.

DBCA, LGAs and DFES work collaboratively to manage bushfires based on known values and risks, weather forecasts, fire behaviour and commitment of firefighting resources across regions and the State. Due to the large and remote areas of sandalwood distribution it is not typically logistically feasible to protect sandalwood areas through direct suppression actions. Satellite, aerial and ground resources for monitoring bushfires are potential resources to monitor and record fire impact on sandalwood habitats.

Management actions

- a) *DBCA will seek to consider location and potential impacts on sandalwood populations in planning and implementing prescribed burns.*
- b) *When recommending future limits on the amount of sandalwood that can be harvested from the wild, DBCA may consider previous and potential impacts of bushfire derived from relevant monitoring and modelling data.*

Strategy 7: Adapt sandalwood management to climate change.

In 2015, the Commonwealth Scientific and Industrial Research Organisation (CSIRO) and the Australian Bureau of Meteorology (BoM) released a set of national climate projections for clusters and sub-clusters across the Australian continent. The clusters are defined by groupings of natural resource management (NRM) regions. Sandalwood distribution extends across three of the sub-clusters (refer Appendix 1):

- Rangelands North;
- Rangelands South; and
- Southern and South-western Flatlands West.

For the Rangelands sub-clusters, mean air temperature is projected to increase, the hottest days are projected to become hotter, and the frequency of hot days and duration of hot spells are projected to increase. The number of frost days is projected to reduce. There has been a small decline in winter rainfall in the south since 1960 with natural climate variability predicted to be the main driver of rainfall changes to 2030. However, by 2090, winter rainfall is projected to decrease by up to 45 percent, with changes to summer rainfall possible but unclear (Watterson *et al.*, 2015).

For the Southern and South-western Flatlands West sub-cluster, mean air temperature is projected to increase, the hottest days are projected to become hotter, and the frequency of hot days and duration of hot spells are projected to increase. The number of frost days is projected to reduce. There has been a prolonged period of extensive drying since the 1970s, particularly in autumn and early winter. By 2030, winter rainfall may decrease by 5 to 15 percent. By 2090, winter rainfall may decrease by up to 30 percent (with low carbon emissions) and up to 45 percent (with high carbon emissions). The frequency and duration of drought is projected to increase (Hope *et al.*, 2015).

Management action

- a) *DBCA will maintain currency in knowledge and contemporary management approaches in relation to climate change and its possible impacts on sandalwood. Future planning for the management of sandalwood, particularly establishment programs, will seek to account, where reasonable and practicable, for authoritative climate change predictions.*

Strategy 8: Minimise the impact on sandalwood from lawful clearing.

Mining tenements with active extraction and exploration operations and road reserves with active expansion projects that often impact sandalwood habitats occur within the sandalwood distribution. These clearing activities are made lawful under Part IV Division 2 and Part V Division 2 of the EP Act, the Clearing Regulations and the Mining Act. Exploration is specifically considered in this legislation as a low impact mineral or petroleum activity.

Sandalwood trees are cleared and disturbed in these processes and while sandalwood seed may be included in rehabilitation seed mixes, they are not generally replaced in equivalent number.

DBCA may request that proponents proposing activities on CALM Act lands conduct targeted surveys for sandalwood and recommend measures for sandalwood protection. On lands not defined as CALM Act lands (including lands proposed for addition to the CAR reserve system), there is no statutory mechanism for DBCA to request measures for sandalwood survey or protection from the impacts of lawful clearing or mineral exploration.

It is important that wherever possible, sandalwood impacted by clearing operations is utilised rather than lost to windrows, mulching or burning.

Management actions

- a) *DBCA will produce and promote a sandalwood guidance paper for development regulators and proponents, summarising processes for sandalwood conservation through investigation (survey) and planning; and the importance of resource utilisation where disturbance is unavoidable.*
- b) *DBCA will seek to provide advice, where appropriate, in relation to development proposals where sandalwood has been identified (including, but not limited to, proposals for infrastructure development, exploration and/or extraction of minerals and petroleum resources), with a view to:*
 - i. *minimise the impact on sandalwood populations, sandalwood scientific plots and sandalwood monitoring sites as a result of disturbance; and*
 - ii. *advise the proponent, the FPC and/or licence holders of opportunities to remove sandalwood from approved disturbance locations.*

Strategy 9: Protect soil and water quality as fundamentals to sandalwood biodiversity health.

Soil and water conservation is intimately linked to biodiversity conservation and to sustaining the productive capacity and health of ecosystems.

Disturbances from activities associated with sandalwood take, such as tree extraction, road construction, machines accessing the bush, and camp establishment can be detrimental to soil and water resources. Impacts such as compaction, rutting, hydrocarbon contamination and vegetation breakage can be mitigated through management controls. Conversely, certain types of soil disturbance that loosen and open the soil can assist sandalwood establishment.

DBCA requires licence holders to conduct operations in accordance with operational controls to minimise adverse impacts on soil and water values resulting from sandalwood operations.

Management actions

- a) *DBCA may undertake both regular and opportunistic monitoring of compliance with licence conditions for soil disturbance limits.*
- b) *DBCA will investigate reports of soil or water contamination resulting from sandalwood operations, and take appropriate action.*

Objective: Maintain sandalwood's natural distribution; and improve population condition.

Strategy 10: Establish sandalwood seedlings to maintain wild sandalwood populations in the long term.

Existing impacts have affected sandalwood recruitment and consequently, there has been a decline in sandalwood occurrence across most of its range (Herford *et al.*, 2015).

Where threats can be ameliorated, there is an opportunity to establish and recruit sandalwood through seeding operations (Brand, 2000, Brand *et al.*, 2014). To redress the lack of establishment and recruitment that has occurred over many decades, and to replace trees lost through natural mortality, seeding operations must aim to increase the total sandalwood population rather than only replace trees taken under licence or other authority. Incorporating seedling operations as a stipulated condition of a sandalwood licence assists in increasing the total sandalwood population.

Conservation reserves throughout the rangelands and wheatbelt have strong potential to be sandalwood establishment areas. To protect the species' genetic diversity, it is preferred that genetically appropriate, regionally sourced seed is used for planting in conservation reserves.

Pastoral leases with no sheep or goats, and sustainable cattle numbers have potential for sandalwood establishment, as do areas of UCL, particularly where populations of wild dogs are present and controlling feral ungulate and rabbit numbers. Broader scale plantings in the Eastern Goldfields, Edel, Southern Cross and Tallering IBRA sub-regions may utilise seed sourced from Wheatbelt plantations that are generally of the southern genetic group. Establishment programs in other IBRA sub-regions should use seed known to be of the northern genetic group.

Natural sandalwood regeneration and recruitment may be encouraged by retaining trees capable of producing large quantities of viable seed (seed trees) in areas subject to take. Seed trees have a healthy crown; a stem diameter greater than 50mm; and are located in close proximity to other seed trees. The minimum take size required by the BC Regulations is in part set to preserve a growing stock of seed-bearing trees.

Natural regeneration may occur in small creeks, tributaries or in locations where interrupted overland water flow allows seed to be dispersed and deposited. Locations where seed dispersing marsupials have (or are planned to be) re-introduced also provide opportunity for sandalwood to naturally regenerate.

Management action

- a) *DBCA will develop a sandalwood establishment strategy that:*
 - i. *identifies priority establishment locations;*
 - ii. *creates baseline sandalwood data to assess successes/failings of establishment projects and threat controls;*
 - iii. *includes sandalwood seeding and regeneration encouragement operations in joint management conservation programs with traditional owners;*
 - iv. *complies with sandalwood establishment as a licence condition provided for by the Sandalwood Licensing Guidelines;*
 - v. *retains seed trees as a licence condition provided for by the Sandalwood Licensing Guidelines;*
 - vi. *promotes seed orchard establishment to produce northern genetic group and other specific seed supplies; and*
 - vii. *considers sandalwood establishment in fauna re-introduction locations to renew localised natural sandalwood regeneration cycles; and provide a food source for re-introduced ground dwelling marsupials.*

Strategy 11: Set regional protocols for sandalwood conservation, protection and management.

The BC Regulations regulate sandalwood take through requirement for licences and prescribing minimum sizes for living (green) trees. However, sandalwood varies genotypically and phenotypically across its distribution in response to many different natural and anthropogenic factors. To achieve biodiversity conservation, protection, and management objectives, regionally specific management protocols that account for sandalwood population condition and species threats are required in addition to legislative controls.

Sandalwood management regions may be defined by the IBRA bioregions and sub-regions (Table 2) as the most appropriate foundation due to being the basis for CAR reserve system objectives; and as the nationally agreed basis for biogeographical regionalisation.

Management actions

- a) *DBCA plans to formulate regional protocols for sandalwood conservation, protection and management through Sandalwood Licensing Guidelines that set licence restrictions for sandalwood take in each IBRA region or sub-region within the sandalwood distribution.*
- b) *When issuing licences to take or supply sandalwood, DBCA may apply the regional protocols for sandalwood conservation, protection and management.*

Objective: Inform conservation through research and knowledge acquisition strategies

Strategy 12: Identify knowledge gaps in existing research relevant to sandalwood biodiversity conservation.

Sandalwood is a highly studied species with an extensive library of published peer reviewed research and management documents. However, continued demand for the species as a commercial resource under changing environmental conditions requires the highest possible level of understanding to prescribe adaptive management actions for ecologically sustainable use.

It is critical that sandalwood research is not constrained by, or to, a western science framework. Aboriginal traditional owner knowledge that has developed and sustained through innumerable generations connected with Country has intrinsic importance to biodiversity conservation, ecological processes, sustainable resource use and management. Traditional knowledge systems are by their very nature complex, holistic and interdisciplinary. Combining traditional knowledge with western science in a respectful and complementary manner can produce highly successful and innovative outcomes (Milroy, 2013).

Possible deficits in the sandalwood knowledge base may include regional genetic provenances and the importance of sandalwood seed as a food source for ground dwelling marsupials.

Management actions

- a) *DBCA will instigate a strategic review of existing research and available records to identify knowledge gaps.*
- b) *Respecting principles of free, prior and informed consent, DBCA will seek and integrate available traditional knowledge of sandalwood biology and ecologically sustainable use in decision making processes.*
- c) *DBCA may undertake and encourage research to address identified knowledge gaps in collaboration with other research organisations.*

Strategy 13: Quantify and improve sandalwood inventory and population condition monitoring.

Broad sandalwood resource assessments (inventory) were commenced by DBCA's predecessors in 1980 and were continued by the FPC beyond 2000. Yield estimates have been generated in 1991, 2000 and 2015.

The FPC's 2015 strategic inventory and yield model, as reviewed by DBCA, was used to inform the Sandalwood Order. The inventory projections were generated from data collected from Crown lands that were legislatively available for harvest, i.e. not CALM Act lands. This inventory was a consolidation of the earlier inventories and further work by the FPC to define the geographic occurrence, distribution of tree size and condition of the available standing resource. This inventory indicates sandalwood numbers to be in the order of tens of millions.

The FPC's longer-term yield projections were contained to their primary wild sandalwood supply area, defined as four of the 29 IBRA sub-regions (Eastern Goldfields, Eastern Murchison, Southern Cross and Tallering) within the total distribution. Other sub-regions were excluded from inventory projections due to:

- the resource being more scattered and less commercially viable;
- continued and extensive feral and domestic ungulate grazing preventing opportunity for regeneration;
- being in locations with less than 200mm annual rainfall and/or receiving summer dominant rainfall preventing opportunity for regeneration; and/or
- insufficient field assessment.

Sandalwood populations are widely dispersed with individual plants in populated areas often being hundreds of metres apart. While sandalwood inventory is based on a small sample size due to the logistics of sampling the large distribution area, estimates of the total standing resource have a level of precision that is characteristic of strategic inventories and provide an acceptable basis for regulating the yield (Herford *et al.*, 2015).

The supply area inventory data was modelled to forecast the standing resource, tree diameter class distribution, and number of seed trees arising from varied levels of take. Application of the model required input of future rates of sandalwood establishment, growth, mortality and recruitment across the various supply zones. While the default values used are generally based on sound data, these key variables are subject to considerable uncertainty over time, generating reduced reliability for long-term projections. To mitigate this uncertainty a short planning horizon (10 years) for the Sandalwood Order was adopted; and effective monitoring to inform future take limits was recommended (Herford *et al.*, 2015).

Management actions

- a) To broaden sandalwood population understanding and inventory sources, DBCA will require licence applicants to submit sandalwood inventory as prescribed by the Sandalwood Licensing Guidelines.*
- b) DBCA will seek to undertake periodic strategic inventory of wild sandalwood populations on lands managed for conservation and/or other lands to confirm conservation status improvement or decline of the species.*
- c) DBCA will build its database on sandalwood population health for reviews of the BMP and regional protocols for sandalwood conservation, protection and management, and inform future limits on amounts of sandalwood that can be harvested from the wild.*
- d) DBCA with traditional owners, may prepare inventory protocols supported by materials and tools to assist Aboriginal communities in their sandalwood management and application of traditional knowledge.*

Objective: Engage, implement and review the Programme.

Strategy 14: Provide opportunity for stakeholder and public engagement and participation.

The community needs to have confidence that the highly environmentally and economically valuable sandalwood resource is being managed responsibly and sustainably. DBCA values public participation and recognises the need to continue to consider, in a meaningful way, the knowledge and opinions of others as part of its decision-making process.

Stakeholder and public engagement processes will be transparent, accessible, accountable, inclusive and supported by factual information. Public participation opportunities have been provided in the Programme's preparation. Engagement and participation opportunities will continue through implementation and review stages of the programme, and stakeholder and public views will be considered to develop objectives that reflect community expectations.

DBCA acknowledges that Native Title extends across the vast sandalwood distribution and involvement of traditional owners as partners or joint land managers is vital in implementing the Programme.

DBCA will also engage across government in implementing the Programme.

Management actions

- a) *DBCA will seek to provide engagement opportunities and consider the views of stakeholders and the wider public in finalising, implementing and reviewing the Programme.*
- b) *DBCA will seek opportunities to consult, partner with and empower Traditional Owners in on-Country sandalwood management and joint land management.*

Strategy 15: Define agency responsibilities in implementing the Programme.

DBCA is established through the CALM Act and promotes biodiversity and conservation through sustainable management of Western Australia's species, ecosystems, lands and the attractions in its care. As such, DBCA is the lead agency responsible for implementing the Programme.

Several management actions are intended to be achieved through application of sandalwood licence conditions that DBCA personnel may monitor in the field and/or require licence holders to return records, maps or other evidence that licence conditions have been satisfied.

Management action

- a) *DBCA will identify measures and targets for management actions where appropriate.*

Strategy 16: Prescribe the review process and timeframe.

Management action

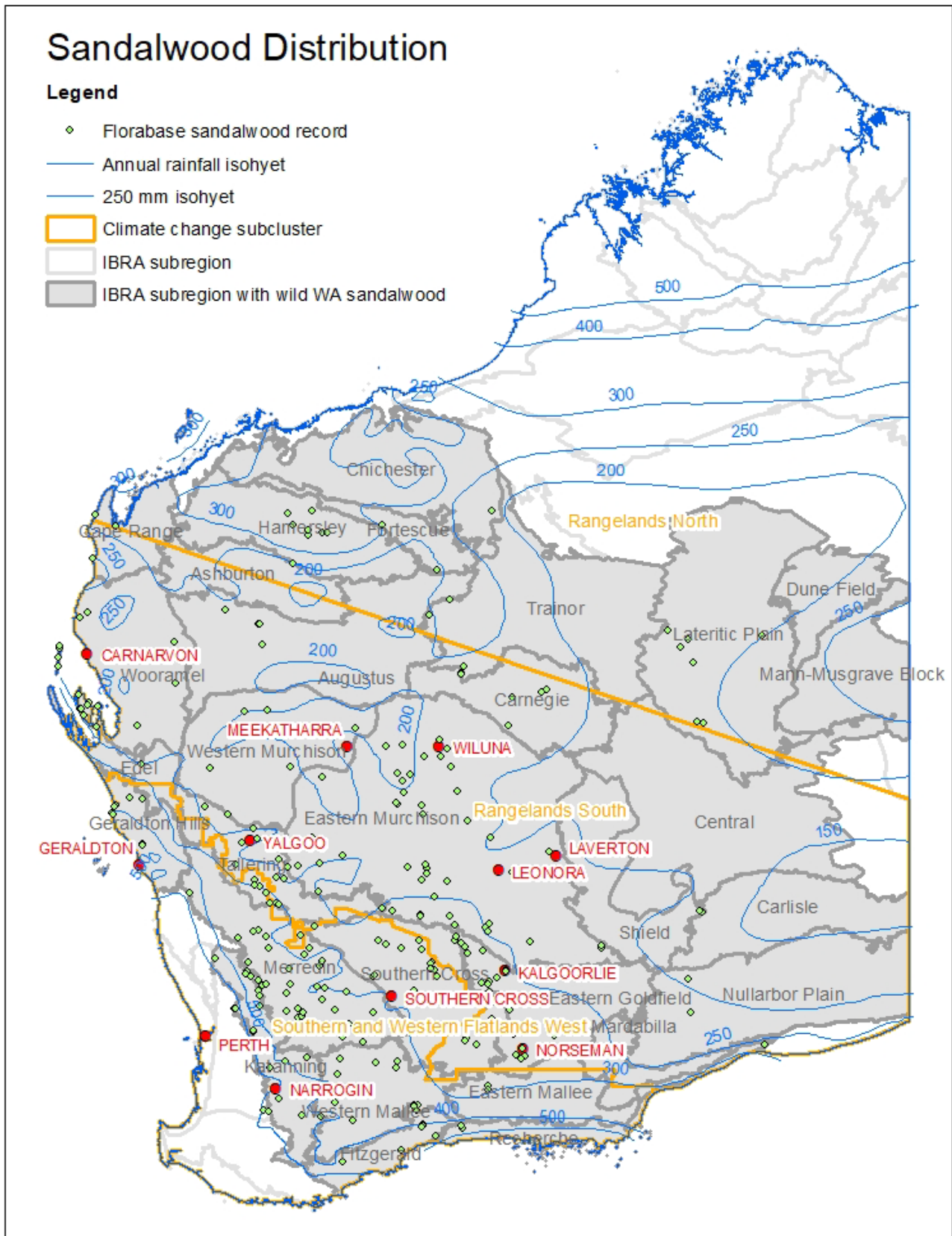
- a) *Consistent with the BC Act s58(2), DBCA will review this BMP toward the end of the initial five-year term. The review will evaluate the extent to which strategies have been achieved by the management actions of the BMP.*

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Appendix 1: Sandalwood Distribution



Appendix 2: Summary of Objectives, Strategies and Management Actions

Objective	Strategy	Management action
Manage sandalwood take for ecologically sustainable use	1. Protect and manage sandalwood populations throughout the species' Western Australian distribution through a comprehensive, adequate and representative (CAR) reserve system.	<p>a) Continue to manage the CAR reserve system for the protection of sandalwood and other conservation values.</p> <p>b) Progress the reservation of former pastoral leases purchased for conservation under the CALM Act toward the 17 percent target in IBRA bioregions with sandalwood distribution.</p> <p>c) Work with native title holders and joint management partners to establish and protect sandalwood on lands included in the CAR reserve system.</p>
	2. Review and potentially revise lawful sandalwood take quantities to maintain productive capacity of sandalwood populations and associated ecosystems.	<p>a) DBCA will determine and recommend a sandalwood take quantity for the Minister to issue an order that will replace the Sandalwood Order in 2027. In limiting the sandalwood take, recommendations will account for:</p> <ul style="list-style-type: none"> i. environmental and social sustainability within the definition for ecologically sustainable use of the BC Act s69(2); ii. regional licence protocols for sandalwood conservation, protection and management (to be developed); iii. strategic inventory, resource and population modelling iv. scale and effectiveness of sandalwood establishment operations; and v. the extent to which a supply of plantation sandalwood may enhance the conservation of wild sandalwood. <p>b) DBCA will review regulation 67(c) (that prescribes the minimum size permitted for take of sandalwood) and recommend changes if considered necessary to maintain best practice consistent with contemporary species biology and population knowledge.</p>
Manage and mitigate threats to sandalwood and sandalwood populations.	3. Limit the impact of weeds, feral animals and diseases on sandalwood.	<p>a) DBCA may undertake additional predator control in locations with known woylie and other sandalwood seed caching marsupial populations within available resources.</p> <p>b) In land management decisions, DBCA may determine there are locations where wild dog predation of herbivores is more beneficial to native flora conservation than wild dog control measures.</p> <p>c) DBCA may increase feral herbivore controls in areas with established sandalwood seedlings and saplings, within available resources.</p>
	4. Establish sandalwood in locations not grazed by domestic ungulates.	<p>a) In assessing applications to take living (green) sandalwood, DBCA will apply Sandalwood Licensing Guidelines with specific criteria for locations subject to agricultural sheep or goat enterprises.</p>
	5. Provide effective compliance and enforcement to combat illegal sandalwood trafficking across the supply chain from the point of origin.	<p>a) DBCA will maintain and, if resources permit, increase wildlife (sandalwood) enforcement operations.</p> <p>b) DBCA will continue to undertake compliance and enforcement action to protect sandalwood and support ecologically sustainable use consistent with the provisions of the BC Act.</p> <p>c) Industry harvest returns and the licensee and production contract supply chains may be audited.</p>

Objective	Strategy	Management action
Cont... Manage and mitigate threats to sandalwood and sandalwood populations.	6. Use and respond to fire to mitigate the impact of fire on sandalwood populations.	a) DBCA will seek to consider location and potential impacts on sandalwood populations in planning and implementing prescribed burns. b) When recommending future limits on the amount of sandalwood that can be harvested from the wild, DBCA may consider previous and potential impacts of bushfire derived from relevant monitoring and modelling data.
	7. Adapt sandalwood management in response to impacts of climate change.	a) DBCA will maintain currency in knowledge and contemporary management approaches in relation to climate change and its possible impacts on sandalwood. Future planning for the management of sandalwood, particularly establishment programs, will seek to account, where reasonable and practicable, for authoritative climate change predictions.
	8. Minimise the impact of lawful clearing on sandalwood.	a) DBCA will produce and promote a sandalwood guidance paper for development regulators and proponents, summarising processes for sandalwood conservation through investigation (survey) and planning; and the importance of resource utilisation where disturbance is unavoidable. b) DBCA will seek to provide advice, where appropriate, in relation to development proposals where sandalwood has been identified (including, but not limited to, proposals for infrastructure development, exploration and / or extraction of minerals and petroleum resources), with a view to: <ol style="list-style-type: none"> i. minimise the impact on sandalwood populations, sandalwood scientific plots and sandalwood monitoring sites as a result of disturbance; and ii. advise the proponent, the FPC and/ or licence holders of opportunities to remove sandalwood from approved disturbance locations.
	9. Protect soil and water quality as fundamentals to sandalwood biodiversity and health.	a) DBCA may undertake both regular and opportunistic monitoring of compliance with licence conditions for soil disturbance limits. b) DBCA will investigate reports of soil or water contamination resulting from sandalwood operations and take appropriate action.
Maintain sandalwood's natural distribution; and improve population condition.	10. Establish and support growth of sandalwood seedlings to supplement and maintain wild sandalwood populations in the long term.	a) DBCA will develop a sandalwood establishment strategy that: <ol style="list-style-type: none"> i. identifies priority establishment locations; ii. creates baseline sandalwood data to assess successes/ failings of establishment projects and threat controls; iii. includes sandalwood seeding and regeneration encouragement operations in joint management conservation programs with traditional owners iv. complies with sandalwood establishment as a licence condition provided for by the Sandalwood Licensing Guidelines; v. retains seed trees as a licence condition provided for by the Sandalwood Licensing Guidelines; and vi. promotes seed orchard establishment to produce northern genetic group and other specific seed supplies. b) considers sandalwood establishment in fauna re-introduction locations to renew localised natural sandalwood regeneration cycles; and provide a food source for re-introduced ground dwelling marsupials.
	11. Set regional protocols for sandalwood conservation, protection and management.	a) DBCA plans to formulate regional protocols for sandalwood conservation, protection and management through Sandalwood Licensing Guidelines that set licence restrictions for sandalwood take in each IBRA region or sub-region within the sandalwood distribution. b) When issuing licences to take or supply sandalwood, DBCA may apply the regional protocols for sandalwood conservation, protection and management.

Objective	Strategy	Management action
Inform conservation through research and knowledge acquisition strategies.	12. Identify knowledge gaps in existing research relevant to sandalwood biodiversity conservation.	<ul style="list-style-type: none"> a) DBCA will instigate a strategic review of existing research and available records to identify knowledge gaps. b) Respecting principles of free, prior and informed consent, DBCA will seek and integrate available traditional knowledge of sandalwood biology and ecologically sustainable use in decision making processes. c) DBCA may undertake and encourage research to address identified knowledge gaps in collaboration with other research organisations.
	13. Quantify and improve sandalwood inventory and population condition monitoring.	<ul style="list-style-type: none"> a) To broaden sandalwood population understanding and inventory sources, DBCA will require licence applicants' to submit sandalwood inventory as prescribed by the Sandalwood Licensing Guidelines. b) DBCA will seek to undertake periodic strategic inventory of wild sandalwood populations on lands managed for conservation and/or other lands to confirm conservation status improvement or decline of the species. c) DBCA will build its database on sandalwood population health for reviews of the BMP and regional protocols for sandalwood conservation, protection and management, and inform future limits on amounts of sandalwood that can be harvested from the wild. d) DBCA with traditional owners, may prepare inventory protocols supported by materials and tools to assist Aboriginal communities in their sandalwood management and application of traditional knowledge.
Engage, implement and review the Programme.	14. Provide opportunity for stakeholder and public engagement and participation.	<ul style="list-style-type: none"> a) DBCA will seek to provide engagement opportunities and consider the views of stakeholders and the wider public in finalising, implementing and reviewing the Programme. b) DBCA will seek opportunities to consult, partner with and empower Traditional Owners in on-Country sandalwood management and joint land management.
	15. Define agency responsibilities for implementation of the Programme.	<ul style="list-style-type: none"> a) DBCA will identify measures and targets for management actions where appropriate.
	16. Prescribe the review process and timeframe.	<ul style="list-style-type: none"> a) Consistent with the BC Act s58(2), DBCA will review this BMP toward the end of the initial five-year term. The review will evaluate the extent to which strategies have been achieved by the management actions of the BMP.



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Draft *Santalum spicatum* (Sandalwood) Biodiversity Management Programme frequently asked questions

What is a biodiversity management programme and why does sandalwood need one?

In accordance with Part 5 of the *Biodiversity Conservation Act 2016* (BC Act), the purpose of a biodiversity management programme is to provide for the conservation, protection, and management of native species. Sandalwood is a native species that has remained in commercial demand for over 170 years and as such, requires a biodiversity management programme to deal with matters that may impact on its continued ecologically sustainable use.

Sandalwood is listed as vulnerable on the International Union for Conservation of Nature's (IUCN) red list. Why does the draft *Santalum spicatum* (Sandalwood) Biodiversity Management Programme (Sandalwood BMP) not address this?

The processes for assessing species' conservation status are separate to the purpose of a biodiversity management programme, being to set parameters to manage for conservation, protection and ecologically sustainable use.

The Department of Biodiversity, Conservation and Attractions (DBCA) has received a nomination for sandalwood to be listed as a threatened species under the BC Act. As the species occurs in Western Australia and South Australia, the nomination is subject to the national Intergovernmental Memorandum of Understanding – Agreement on a Common Assessment Method for Listing of Threatened Species and Threatened Ecological Communities (see awe.gov.au/environment/biodiversity/threatened/cam). As such, the nomination has been referred to the Commonwealth to facilitate cross-jurisdictional assessment. Listing under the State's BC Act will be considered once the Commonwealth process is complete.

The outcome of the listing assessment may change management of the species in Western Australia.

Why doesn't the Sandalwood BMP recommend annual harvest quantities?

The *Sandalwood (Limitation on Removal of Sandalwood) Order (No. 2) 2015* (Sandalwood Order) remains in place until 31 December 2026. As such, the Government is committed to the Sandalwood Order's prescribed quantities through licences and contracts until that time.

The Sandalwood BMP contains a strategy to review and revise the Sandalwood Order quantities that may be taken while maintaining the productive capacity of sandalwood populations and associated ecosystems. With information gained from inventory and population condition monitoring consistent with actions in the Sandalwood BMP, DBCA expects to be able to provide informed recommendations to the Minister for Environment on future sandalwood harvest levels.

Why isn't the Sandalwood BMP ending wild sandalwood harvest?

The BC Act provides for the ecologically sustainable use of native animals and plants. Ecologically sustainable use of sandalwood enables commitments made through the Taskforce for the

Advancement of Aboriginal economic development using wild harvest sandalwood to be met. The Sandalwood BMP seeks to provide an appropriate balance in providing economic opportunities for Aboriginal communities and regional businesses in a manner that does not diminish the viability and condition of wild sandalwood populations. Further, the sandalwood industry provides investment into programs for sandalwood regeneration and restoration that are hoped to be delivered through joint management of lands with traditional owners.

Why is plantation sandalwood not replacing the harvest of wild sandalwood?

Plantation sandalwood is outside the scope of a biodiversity management programme as permitted by the BC Act. The commitments made through the Taskforce for the Advancement of Aboriginal economic development using wild harvest sandalwood support wild sandalwood resources, particularly in proximity to Rangeland Aboriginal communities remaining available for harvest at ecologically sustainable levels.

The maturing plantation resource was a component that influenced the 10-year timeframe of the Sandalwood Order, and is expected to be considered in formulating the next Order.

Why does the Sandalwood BMP not consider traditional cultural, medicinal and nutritional uses of sandalwood?

Section 5 of the BC Act specifically limits the scope of biodiversity management programmes to matters of biodiversity and matters that impact biodiversity (including ecologically sustainable use).

What are the sandalwood licensing guidelines that the Sandalwood BMP refers to?

The guidelines are being developed to provide guidance to DBCA staff in implementing aspects of the Sandalwood BMP that involve sandalwood licensing, licence application approvals and licence conditions for requirements such as regeneration, and for licence applicants to understand the information needed to successfully apply for a sandalwood licence.