

## Summary of feedback received since the release of the Scope of works<sup>1</sup>

### Review of the *Sandalwood (Limitation of Removal of Sandalwood) Order (No. 2) 2015* (2015 Sandalwood Order)

#### Introduction

Since commencing the review of the 2015 Sandalwood Order, the Department of Biodiversity, Conservation and Attractions (DBCA) has been receiving input from Aboriginal people and various stakeholders<sup>2</sup>.

DBCA also acknowledges previous consultation processes relevant to the review of the Sandalwood Order including public comments in drafting the Sandalwood Biodiversity Management Programme, and the WA Sandalwood Taskforce process, which made recommendations to provide economic opportunities for Aboriginal people in the wild sandalwood industry.

DBCA has been and remains committed to ongoing consultation throughout the review process and interactions with stakeholders and Aboriginal people have been informative in helping shape the review. For more information about the process refer to [dbca.wa.gov.au/management/sandalwood](https://dbca.wa.gov.au/management/sandalwood).

This document summarises the consultation DBCA has undertaken, the feedback that has been received and outlines where feedback is directly relevant to helping shape the review of the Sandalwood Order. This summary is not comprehensive but highlights some key viewpoints and matters that are most relevant to the review. Feedback has been kept anonymous unless explicit permission has been provided for identifying information to be disclosed. No feedback provided in confidence is disclosed in this summary.

DBCA would like to again thank all those who have taken time to engage and provide input into the review process to date.

#### Methods of consultation

Since 2024, DBCA staff have been engaging with key stakeholders through various means including by phone, site visits, meetings, brief presentations and emails. In August 2025, key DBCA staff, together with the Independent Panel, undertook week-long engagement and site visits within Western Australia (Kalgoorlie and Perth based). The visit involved a series of face-to-face discussions with stakeholders, Aboriginal groups and Traditional Owners, as well as field visits to provide a better understanding of wild sandalwood and the commercial activities that are relevant to the setting of a Sandalwood Order. Where meetings were held, notes were captured and shared with all parties involved.

Some consultations mainly involved information sharing (about the Sandalwood Order review), whereas other consultations included the provision of extensive feedback and/or

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<sup>1</sup> The *Scope of works for the review of the Sandalwood (Limitation of Removal of Sandalwood) Order (no. 2) 2015* (Scope of works) was released December 2024.

<sup>2</sup> DBCA maintains a bulk email list for updates about the 2015 Sandalwood Order review. An initial bulk mailing was sent in December 2024 with the release of the *Scope of works*. Recipients are welcome to request their details be removed from the bulk mailing list and they are free to forward the email to others who can request to be added to the mailing list. DBCA extends the invitation for recipients to contact [sandalwood@dbca.wa.gov.au](mailto:sandalwood@dbca.wa.gov.au) or phone (08) 9219 900 with questions and/or to provide information.

best available information. Further consultation is still to occur during the public comment period with the release of the *Review of the Sandalwood (Limitation of Removal of Sandalwood) Order (No. 2) 2015, 2026 Draft Review Report* (Draft Review Report).

Of the over 140 contacts on DBCA's bulk sandalwood email list, DBCA has had interactions with more than 40 individuals and/or groups representing a range of stakeholders including, but not limited to, registered Native Title Body Corporates and Aboriginal Corporations, Government agencies, members of the public, industry groups, and non-government organisations.

### Feedback received

Since the release of the *Scope of works* in December 2024), feedback received mainly relates to:

1. the take (harvest) limit to be set in a new Sandalwood Order, including for both living (green) and dead wood;
2. the role of State Government/Forest Products Commission (FPC) in the commercial wild sandalwood industry and the allocation of harvest limits between the FPC and Biodiversity Conservation regulation 67 licence holders;
3. providing opportunities for Aboriginal groups and Traditional Owners, as well as consideration of Native Title rights to the sandalwood resource;
4. the role of the *Santalum spicatum* plantation industry; and
5. illegal harvesting.

DBCA acknowledges that the feedback received to date does not necessarily represent the views of the broader community. All submissions received during the public consultation period will be analysed.

Feedback received on each of the key themes listed above is discussed below.

#### 1. Sandalwood Order take limit

No feedback has been received that recommended a higher limit on the take of living (green) sandalwood (i.e. that future limits for living take be increased). Some have made reference to *Santalum spicatum* being listed on the IUCN Red List of globally threatened species. Some submissions cited the capacity of the *S. spicatum* plantation industry to 'service' the industry and/or to promote increasing plantation-based production, to support a reduced wild sandalwood harvest, as well as a means to prioritise species conservation.

Although there has been general support for reducing the total harvest limit for wild sandalwood, DBCA has received feedback that sustainable management of sandalwood through commercial harvest activity facilitates regeneration. This viewpoint correlates with findings presented in the *Review of the Sandalwood (Limitation of Removal of Sandalwood) Order (No. 2) 2015, 2026 Draft Technical Report* (Draft Technical Report) that commercial harvesting accompanied by seeding has the potential to improve regeneration outcomes at a localised level where sustainability actions<sup>3</sup> are met.

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<sup>3</sup> For an overview of sustainability actions required to harvest sandalwood, refer to the CEO Guideline to support the Biodiversity Conservation Regulations, Sandalwood Licensing available at [dbca.wa.gov.au/licences-and-permits/sandalwood-licences](http://dbca.wa.gov.au/licences-and-permits/sandalwood-licences) .

A submission/statement of position made by the Aboriginal Sandalwood Alliance (ASA), which is an Indigenous Western Australian-based industry group (see [aboriginalsandalwoodalliance.com.au](http://aboriginalsandalwoodalliance.com.au)), stated:

*'Reducing the wild harvest quota is widely supported by Aboriginal custodians, conservation groups, and industry, including ASA'.*

Another submission asked DBCA working group members to:

*'Recommend a significant reduction in the overall quota of wild sandalwood harvest and a higher reallocation within that quota for Aboriginal business, away from the Forest Products Commission, noting the:*

- a. Established capacity of private sandalwood plantations to service the industry; and*
- b. The long-standing position of State Government to transition out of the wild sandalwood industry once private industry is established and sustainable.'*

Some have voiced an opinion that the take of dead wood should not be as restrictive, with one written submission stating:

*'Leaving dead wood harvest quantities open or at a suitable higher level will encourage deadwood utilisation, permit salvage, allow business opportunities and less potential loss of valuable resource (eg to successive fires). Deadwood harvest associated with seeding operations will greatly contribute to priority regeneration and conservation of sandalwood funded by industry.'*

Points have been made that the sustainable harvest of sandalwood allows funding for regeneration. There was also some feedback seeking more transparency on the FPC's regeneration program. One submission stated:

*'What is missing from the public record is quantifiable information, published papers and public reports from the FPC about the extent and success of their seeding operations for the largest component of the previous and current sandalwood harvest.'*

Information about the FPC's 'Operation Woylie' regeneration program is provided in the *Draft Technical Report*. In addition, DBCA has received queries and feedback on the legislative framework including the concern that FPC is not required to obtain approval to commercially harvest sandalwood under the *Biodiversity Conservation Act 2016* (BC Act). Consequently, most sandalwood harvest occurs outside of authorisation of the BC Act, but under other lawful authorisation. Although legislative change is not strictly in the scope of the review, the current situation is relevant to meeting objects of the BC Act, and therefore has been considered.

## 2. Allocation of the take limit

DBCA has received feedback from multiple stakeholders that State Government/FPC should reduce its role in the commercial industry. Various reasons given include, but are not limited to:

- Private businesses and/or sandalwood plantation operations now contribute significantly to the industry, which diminishes the need for State Government involvement.
- The Western Australian Sandalwood Taskforce’s *Advancement of Aboriginal Economic Development Using Wild Harvested Sandalwood* (WA Sandalwood Taskforce) report emphasises a need to cater for an increase in Aboriginal people seeking to undertake sustainable harvest operations.
- Most of the sandalwood distribution is subject to Native Title rights and ‘...FPC access to resource is increasingly, and justifiably, being restricted by Native Title groups’.

Alternative feedback has also been received that FPC involvement in the industry has been important for a number of reasons including market stability, providing job opportunities through contracts, including for Aboriginal businesses, and supporting a landscape-scale seeding program in addition to localised seeding at harvest sites. Feedback has also been provided that the role of Wescorp (the FPC’s sales agent) is unique and provides quality testing and a consistent product, as well as market stability. Supplying a range of products and markets helps to ensure optimal utilisation of harvested trees.

## 3. Opportunities for Aboriginal people

Further to the idea that commercial opportunities should rest more with private industry and Aboriginal people, the ASA provided the following information in its written submission to DBCA:

*‘Alignment with Government commitments: Our request for support aligns with the Western Australian Government’s existing policy frameworks, including the National Agreement on Closing the Gap and the Aboriginal Empowerment Strategy 2021–2029, which emphasise self-determination, connection to Country, and meaningful economic participation. ASA sees this as an opportunity to help deliver on those shared commitments.’*

Further, one submission stated:

*‘Aboriginal custodians have managed sandalwood country for countless generations, using sustainable practices rooted in deep knowledge of the land. By recognising and empowering this role, the Government can achieve better conservation outcomes while supporting self-determination and long-term prosperity for Aboriginal communities.’*

Preliminary results shared with DBCA from a study entitled ‘*Aboriginal Leadership in Sandalwood: Education and Training Strategy to Support Conservation and Sustainable Harvesting in WA*’ have provided additional context for the review of the 2015 Sandalwood Order. Among the findings, the project highlights the deep connection that Aboriginal people have to sandalwood and the land and the potential future opportunities for Aboriginal people to be involved in the sandalwood industry.

The *Draft Review Report* will consider connection to Country, Native Title rights and the WA Government's *Closing the Gap Implementation Plan 2023–2025* in making recommendations associated with providing opportunities for Aboriginal people.

#### **4. *Santalum spicatum* plantation industry**

Relevant to reducing the sandalwood take limit and allocation of limit, is the viewpoint that the *S. spicatum* plantation industry now has more capacity to supply quality product to the market, compared with 2015 (at the time of the previous review of the Sandalwood Order).

There are disparate views that have been expressed about the age at which plantations are suitable for commercial harvest. DBCA was provided with plantation data (including oil quality data) for the review of the 2015 Sandalwood Order. The future contribution to the plantation industry will be considered in forming the recommendations for the *Draft Review Report*.

#### **5. Illegal harvesting**

A number of people involved in the industry have reported to DBCA that there seems to be a substantial amount of oil and/or *S. spicatum* wild wood product that is illegal, and DBCA has followed up on reliable intelligence in regard to illegal sandalwood activities. Issues with illegal harvest and the regulation and monitoring of industry will be discussed within the *Draft Review Report*.