

Frequently asked questions – Wild sandalwood (*Santalum spicatum*)

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 (ESU).

Sandalwood is listed as vulnerable on the International Union for Conservation of Nature's (IUCN) red list. Why doesn't the Sandalwood Biodiversity Management Programme (Sandalwood BMP) 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 ESU. The Department of Biodiversity, Conservation and Attractions (DBCA) previously 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 [Extensions to EPBC Act listing assessment and decision timeframes - DCCEEW](#)). As such, the nomination was 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.

What is the link between the Sandalwood BMP and the review of sandalwood harvest limits?

The *Sandalwood (Limitation on Removal of Sandalwood) Order (No. 2) 2015* (Sandalwood Order) remains in place until 31 December 2026. 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 will provide informed recommendations to the Minister for the Environment on future sandalwood harvest levels.

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

The CEO Guideline to support the Biodiversity Conservation Regulations Sandalwood licensing (CEO guideline) has been 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. The CEO Guideline also assists licence applicants understand the information needed to successfully apply for a sandalwood licence.

Why is wild sandalwood being considered for harvesting in Western Australia if it already listed as threatened on the IUCN red list and listed as threatened in South Australia?

The BC Act provides for the ESU of native animals and plants. The Taskforce for the Advancement of Aboriginal Economic Development recommended the ESU of sandalwood provide economic opportunities for Aboriginal communities and regional businesses in a manner that does not diminish the viability and condition of wild sandalwood populations. The sandalwood industry provides investment for the enhancement of sandalwood regeneration. This investment provides opportunities for Caring for Country and employment for Traditional Owners.

Harvesting of wild sandalwood is considered where sustainability and other criteria are met. Licence applicants are required to provide a sustainability and establishment plan with their submissions. Re-seeding and associated monitoring are requirements of all licences.

How will the Commonwealth's assessment of the conservation status of sandalwood for consideration for listing under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) be integrated into the review, and will the review contribute to the assessment?

The review of the Sandalwood Order is being conducted alongside this assessment process. The information gathered is crucial for the conservation of the species, irrespective of whether *Santalum spicatum* is listed as threatened under the EPBC Act.

When did the Sandalwood Order review process start?

DBCA has been preparing for the review for an extended period and commenced re-measurement of sandalwood plots in 2022, followed by the release of the Sandalwood BMP in late 2023. It was important to complete the Sandalwood BMP before formally commencing the review of the Sandalwood Order.

What are the terms of reference of the DBCA working group for the Sandalwood Order review?

The DBCA working group is overseeing the process for the review of the Sandalwood Order, to advise the Minister on setting a new Order commencing from 2027, in accordance with the publicly available *Scope of works for the review of the Sandalwood (Limitation of Removal of Sandalwood) Order (No. 2) 2015* (Scope of works).

What expertise is included on the DBCA working group for the review of the Sandalwood Order?

DBCA's working group for the Sandalwood Order review comprises staff from across various divisions and branches within the department. Expertise includes staff with extensive experience in sandalwood ecology, biogeography, population ecology, population modelling, licensing and compliance, invasive species management, and engagement with Traditional Owners and stakeholders.

How will independent expertise be incorporated into the review?

In accordance with the BC Act and the Sandalwood BMP, DBCA is committed to review the appropriate harvest (take) levels for wild sandalwood and provide informed recommendations to the Minister for the Environment on future harvest levels. A DBCA working group has been established for the purpose of undertaking the review process. An Independent Panel has been appointed to provide feedback and advice to DBCA at key stages of the process, including on the methodology and draft report. The Independent Panel has a combined expertise in biodiversity conservation, population modelling and Traditional Owner engagement. Traditional Owners, environmental non-government organisations and leading scientists will be able to provide input into the review and in 2026 there will be a public comment period.

How is DBCA ensuring that the review is open, transparent and inclusive?

DBCA is providing opportunities for engagement with the full range of stakeholders who are interested and/or impacted by any decisions around the take levels of sandalwood made available for harvest. Stakeholders will contribute to best available information and input into the Sandalwood Order review. Stakeholder consultation will be thorough, open and transparent to ensure sound decision-making regarding the review of the Sandalwood Order. A public comment process will be undertaken for a minimum of six weeks during 2026.

How is DBCA ensuring that the review is science-based to ensure that any level of take of wild sandalwood is sustainable and that an appropriate level of associated management is implemented and maintained?

Since late 2022, a significant number of sandalwood plots have been measured across an extensive area of wild sandalwood's distribution, providing information on occurrence, patterns of sandalwood recruitment, and rates of population increase or decline. In addition, a range of best available information has been used and a range of stakeholders will be consulted. The review process will ensure harvest limits enable ESU of sandalwood and limits set will have regard to the principles of Ecologically Sustainable Development (ESD).

How will Cultural Knowledge be incorporated into the review of the Sandalwood Order?

Traditional Owners are invited to provide input into the process at any stage. Where Cultural Knowledge is permitted for use it will only be used if adhering to Indigenous Cultural and Intellectual Property rights.

How will the recommendations of the Taskforce for the Advancement of Aboriginal economic development using wild harvest sandalwood, be considered?

As mentioned in the *Scope of works* for the Sandalwood Order review, recommendations from the taskforce process will be considered where it is relevant to the scope of the review e.g. allocation of take limits.

Will the availability of plantation sandalwood be included in the Sandalwood Order review regarding the view to reducing the take of wild sandalwood?

The role of the sandalwood plantation industry will be considered regarding formulating future wild take quantities, and with due consideration given to quality, markets, and government involvement. The plantation industry is discussed in the *Review of the Sandalwood (Limitation of Removal of Sandalwood) Order (No. 2) 2015, 2026 Draft Review Report* (Draft Review Report) and will be considered further before finalising the report.

What is the difference between the *Draft Review Report* and the *Review of the Sandalwood (Limitation of Removal of Sandalwood) Order (No. 2) 2015, 2026 Draft Technical Report* (Draft Technical Report)?

The *Draft Review Report* contains draft recommendations for setting a new Sandalwood Order in 2027, whereas the *Draft Technical Report* contains in-depth information on habitat stratification and population modelling. The reports are intended to be read together, but can also be considered as stand-alone reports. The sandalwood population modelling detailed in the *Draft Technical Report* necessarily focuses on the impact that varying levels of living (green) and dead harvest would have on sandalwood population condition and the impact of landscape-scale regeneration. The *Draft Technical Report* does not consider the principles of ESD, as this is within the scope of the *Draft Review Report*.

What was the basis for the development of the scenarios and the recommendation for the 2,000 tonne limit?

The focus of the sandalwood population modelling was to model a suite (or continuum) of harvest scenarios from lower limits up to higher limits (current limits) as well as model 'dead wood only' and 'no harvest' scenarios to understand impacts on Ecologically Sustainable Use (ESU). The range of varying limits modelled provided information to undertake a risk analysis of the species condition under different harvest levels, as well as under the scenario of no further harvest of green (living sandalwood). A series of sensitivity analyses was also undertaken to understand the impacts if key model inputs change, such as if there was regeneration failure.

Modelling the 'status quo' (current) harvest limits as well as a series of lower limits as well as dead wood only and no harvest scenarios provides a broad spectrum of varying limits to enable inferences to be made. The modelling focused on ecological implications and was based on variables such as harvest limit, seeding levels, growth and mortality rates and more. As the scenarios had an ecological focus, further permutations (such as more specific lower harvest limits) would provide limited new information.

The public comment period is a chance for further input into the scenario options and recommended harvest limit to consider the practicalities and ESD implications of the various options and the overall recommended maximum limit.

If the final report recommends a maximum annual limit, does this mean that this amount of wild sandalwood will be harvested per year?

There is no requirement to harvest to the maximum limit. The maximum limit is a limit and not a target.

What feedback is being sought for the public comment period and is the *Draft Technical Report* also subject to the public comment period?

Feedback should be kept within scope where possible. Please refer to the scope of works and/or the *Have your say: Inform the review of the Sandalwood (*Santalum spicatum*) Order* information sheet for more information.

Both the *Draft Review Report* and the *Draft Technical Report* are subject to the public comment period. However, the *Draft Review Report* can be read as a stand-alone document and is intended to be the main document source for the public comment period since it contains the draft recommendations associated with a new proposed Sandalwood Order. Both documents will be finalised following the public comment period.

What are the principles of ESD?

The principles of ESD contained in Section 4 of the BC Act, are as follows:

- (a) decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations;
- (b) if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation;
- (c) the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations;
- (d) the conservation of biodiversity and ecological integrity should be a fundamental consideration in decision-making;
- (e) improved valuation, pricing and incentive mechanisms should be promoted.

In accordance with the principles, ecological integrity is the fundamental consideration in decision-making, but all principles must be considered. This includes taking into account industry structure and needs, as well as Native Title rights as these matters relate to economic, social and equitable considerations.

How does the *Draft Review Report* consider principles of ESD?

Industry development and the recommendations from the WA Sandalwood Taskforce process, as well as input from more recent consultation (see *Summary of feedback received since the release of the scope of works*) with DBCA have been considered in the context of the ESD principles. Proposed recommendations, which consider principles of ESD are presented in the *Draft Review Report* for further consideration through the public comment period.

The *Draft Technical Report* indicates that the dead wood only harvest scenario has the best outcome for ESU, so why does the *Draft Review Report* recommend a limit for harvest of living (green) sandalwood?

The *Draft Technical Report* provides results of simulated modelling for a range of scenarios including: 1) no harvest, and no management intervention, 2) no harvest, but with reseedling, and 3) various levels of living (green) and dead wood harvest. The *Draft Technical Report* concludes dead wood harvest only as the best outcome for ESU. Given economic, environmental, social and equitable considerations including Native Title rights (key considerations for ESD), and the desire to provide for opportunities for Aboriginal people, a level of living (green) and dead harvest is recommended in the *Draft Review Report*.

The conservation of biodiversity and ecological integrity should be fundamental to decision-making is one of the principles of ESD. The impacts on biodiversity and ecological integrity from wild sandalwood harvesting can accommodate a level of living (green) harvest, as it was found that commercial harvest accompanied by seeding has the potential to improve regeneration outcomes at a localised level where sustainability actions are met.

I noticed the Sandalwood Population Projection model used a nominal allocation of different sandalwood quantities for each region. Will the new Sandalwood Order specify a regional quota allocation?

No. A new Sandalwood Order will specify the maximum annual limits for the total take of living and dead wood. Regional protocols have been developed to guide the issuing of licences to take, and these can be found within the flora taking (sandalwood) licence wild stands application kit available at www.dbca.wa.gov.au/licences-and-permits/sandalwood-licences. DBCA acknowledges the need for flexibility in the proportions taken between regions over time in response to a range of factors such as Native Title rights, site conditions, as well as an applicant's sustainability and establishment plan. A further consideration is the need to avoid the total take limit being sourced entirely from commercial harvest areas in a highly concentrated, specific area.

What has been the Independent Panel's role in the process and what can we expect?

As outlined in DBCA's *Scope of works* document (dbca.wa.gov.au/media/4540/download), the Independent Panel provides advice to DBCA on government processes and proposals related to the Sandalwood Order review. Panel members (Ms Chontarle Bellottie, Associate Professor Cristopher Brack, Dr Kylie Lingard and Ms Malory Weston) have reviewed and provided advice in accordance with the Terms of Reference outlined in DBCA's *Scope of works*. The Panel's conclusions and recommendations will be publicly released in a written report after considering further feedback from stakeholders and Traditional Owners following the public comment period. The Panel thanks Traditional Owners, Aboriginal groups and individuals, and stakeholders who shared their insights during the Sandalwood Order field trip (August 2025). Panel members will consider these insights, public submissions, and information from future meetings in the Panel's formal written report to be released after the public comment period. The Panel can be contacted via wasandalwoodpanel25@gmail.com.

How has the consultation to date shaped the Sandalwood Order review process?

Please refer to the *Summary of feedback received since the release of the scope of works* document, which provides a summary of some feedback considered since the release of the *Scope of works* in December 2024. Recommendations from other previous relevant consultation processes including the WA Sandalwood Taskforce process have also been considered.

Preliminary consultation has also included the collation of best available data, some of which is discussed in the *Draft Technical Report*.

When will the review of the 2015 Sandalwood Order be completed and what are the next steps following the public comment period?

DBCA will consider the Sandalwood Order Review process is complete once a new Sandalwood Order is in place, which is intended to occur in 2027. Next steps for the process following the public comment period will include:

1. DBCA will produce a summary of public submissions on the review of the 2015 Sandalwood Order review.
2. The Independent Panel will review and provide advice to DBCA after the public comment period and the Panel's conclusions and recommendations will be publicly released in a written report following the public comment period.
3. DBCA will finalise and publish a Review Report and Technical Report.
4. Following parliamentary processes, it is intended that a new Sandalwood Order will be set. A new Sandalwood Order is subject to disallowance in Parliament.

When will a new Sandalwood Order be in place?

The current Sandalwood Order is in place until 31 December 2026. Due to delays in the Sandalwood Order review process, a new Sandalwood Order will not be in place by 1 January 2027. There may be a period (gap between the current Order ending and a new Order being set) where there is no Sandalwood Order in place.

Can sandalwood still be harvested if the Sandalwood Order is delayed?

Under the BC Act, licences to take/harvest can still be granted, even if a Sandalwood Order is not in place. However, decisions on take/harvest must ensure ESU and consider principles of ESD.