

sandalwood@dbca.wa.gov.au

Community Consultation
Draft Sandalwood Biodiversity Management Programme
Department of Biodiversity Conservation & Attractions
Locked Bag 104
Bentley Delivery Centre WA 6983

Dear Mr Sawyer,

DRAFT SANDALWOOD BIODIVERSITY MANAGEMENT PROGRAMME

The Urban Bushland Council WA Inc (UBC) is pleased to present this submission in response to the Minister for the Environment; Climate Action, the Hon. Reece Whitby MLA's invitation (Ministerial Media Statement 4 November 2022) to:

- shape how sandalwood will be conserved and protected
- help sustain native species for future generations.

Comments attributed to Environment Minister Reece Whitby:

"Sandalwood is a unique resource and we're committed to protecting and sustaining this remarkable species for generations to come.

"This will apply to the management of wild sandalwood on both Crown and private land, but won't apply to plantation sandalwood.

"Having your say will help us understand any industry or community concerns to help shape the management of this important native species."

SOURCE: <https://www.mediastatements.wa.gov.au/Pages/McGowan/2022/11/Community-invited-to-comment-on-sandalwood-management.aspx>

UBC is an incorporated, not for profit organisation registered as a charity.

<https://www.bushlandperth.org.au/>

Our organisation is a voluntary community association of 87 member groups (each with their own local membership from 10-165 individuals) and 100+ individual members – all of whom have a common interest in the conservation of our natural biodiversity – often, but not always focussing on urban bushlands and wetlands.

We advocate to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our 'Friends Groups' and their many volunteers – from all walks of life 'working' to improve and maintain the health of patches of neighbourhood nature – many working in close collaboration with your department and their local council.

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URGENT CALL

Due to the decimated and declining population (distribution, condition, recruitment) of *Santalum spicatum* from land clearing (lawful and unlawful), extraction/harvesting (lawful and unlawful), fire (lawful, unlawful and natural) and climate change (human induced), the UBC puts an urgent call to the WA State Government to:

1. Halt the legal (licensee) extraction and harvesting of wild *Santalum spicatum*.
2. Acknowledge and promote the unfortunately VULNERABLE threatened status of *Santalum spicatum* as determined by the International Union for Conservation of Nature (IUCN) in 2021.
3. Use the most recent data and peer reviewed scientific analysis of *Santalum spicatum* by Richard McLellan (2021) in a re-working of this Draft Biodiversity Management Program (DBMP).
4. Increase budget for the prevention and monitoring of illegal harvesting of *Santalum spicatum*.
5. Audit and act upon returns and licensee contract supply.
6. Ensure illegal extraction and harvesting (both by licensees and others) is strongly prosecuted and fined – and promoted so others are aware of the consequences.
7. Increase budget for the research, development and expansion of *Santalum spicatum* plantations on appropriate cleared lands.
8. Increase budget for biodiversity monitoring and conservation management of *Santalum spicatum* in the wild – including nil availability for extraction and harvesting.
9. Explore options for Indigenous employment in the monitoring and prosecuting of illegal removal and pruning of *Santalum spicatum* by licensees and others.
10. Progress immediately to have the threatened status of *Santalum spicatum* listed as *critically endangered* under both the *WA Biodiversity Conservation Act* and the *Federal Environmental Protection and Biodiversity Conservation Act*.

Acknowledgement (page1)

Recommend change header to Acknowledgement of Country.

Introduction (page 1)

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.

The 'key considerations' are supported – but not all of the resultant DBMP Management actions (refer below).

Purpose (page 1)

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.

It is surprising that whilst the DBMP acknowledges decline in the size and condition *Santalum spicatum* populations, the proposal is to dedicate another 5 years 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.”

On the contrary, there is now great urgency to protect this WA species in the wild, and the scientific research carried out by Richard McLellan for his PhD – published in peer-reviewed publications in 2021 – but astoundingly was not used in this current review that would then enable DBCA to fast track (and probably eliminate) the proposed ‘5 years of further data collection and review’.

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.

This requirement needs to be much stronger than ‘have regard to ...’. The conservation actions must be carried out immediately and be ongoing.

Sandalwood biodiversity (page 4)

We acknowledge and wish to refocus on the scientific research that should be guiding good conservation management of this International Union for Conservation of Nature (IUCN) listed ‘VULNERABLE’ species (IUCN <https://www.iucnredlist.org/species/172724199/172724334#assessment-information>), including:

- Longstanding, scientific research of Owen Loneragan (1990) that demonstrated the incredible time that it takes for *Santalum spicatum* to reach maturity – being 59-115 years.
This long period to maturity does not seem to be taken into account in this DBMP.
- Scientific research by Murphy, Garkaklis and Hardy (2005) and Chapman (2015) demonstrating germination that is dependent on the “seed caching (scatter hoarding) behaviours of ground dwelling marsupials including woylies and boodies”.
It must be anticipated by DBCA that the decline in population of woylies and boodies will have a flow on effect on the ability to aid sandalwood germination. Where has this been factored in?
- The scientific evidence that enabled the IUCN (2021) to list *Santalum spicatum* as a VULNERABLE threatened species (ie potentially on its way to extinction).
<https://www.iucnredlist.org/species/172724199/172724334#assessment-information>

Established in 1964, the International Union for Conservation of Nature’s Red List of Threatened Species has evolved to become the world’s most comprehensive information source on the global extinction risk status of animal, fungus and plant species.

The IUCN Red List is a critical indicator of the health of the world’s biodiversity. Far more than a list of species and their status, it is a powerful tool to inform and catalyse action for biodiversity conservation and policy change, critical to protecting the natural resources we need to survive. It provides information about range, population size, habitat and ecology, use and/or trade, threats, and conservation actions that will help inform necessary conservation decisions.

SOURCE: <https://www.iucnredlist.org/about/background-history>



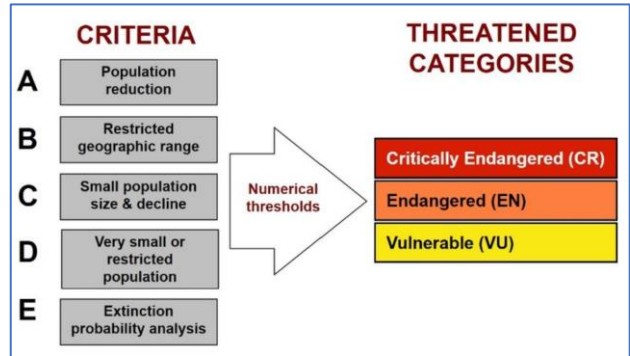
Vulnerable (VU)

A taxon is **Vulnerable (VU)** when the best available evidence indicates that it meets any of the criteria A to E for Vulnerable, and it is therefore considered to be facing a high risk of extinction in the wild.

Species categorized as Vulnerable (VU)

SOURCE: <https://www.iucnredlist.org/>

VULNERABLE A2acd+3cd+4acd



SOURCE: <https://www.iucnredlist.org/about/faqs>

- The scientific research by Richard McLellan – that is also the most recent and has been totally ignored in preparing this important DBMP. McLellan, R.C., Dixon, K. & Watson, D.M. (2021) Prolific or precarious: a review of the status of Australian sandalwood (*Santalum spicatum* [R. Br.] A. DC., Santalaceae). *The Rangeland Journal*, 43(4), 211–222.
Alarmingly, this finds that WA native *Santalum spicatum* is in serious decline across much of its present, now substantially reduced distribution.

Distribution (page 4)

The document presents the assessment of the distribution of *Santalum spicatum* is based on the 1995 work of Thackway and Cresswell.

There is far more up-to-date research and survey work that should be consulted including:

- Department of Agriculture and Food WA/ WA Department of Primary Industries and Regional Development – Land Resource Surveys https://library.dpird.wa.gov.au/land_res/ and associated rangelands surveys.
- Background papers that led to the IUCN Red List.
- 2021 – Richard McLellan PhD and associated peer reviewed documentation – including with other scientists Dixon and Watson.

Current Situation (page 6)

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.

“Still broadly occurs” is not adequate for a ‘Biodiversity Management Plan’. Survey monitoring and data must be updated to present.

Objectives and strategies (page 7)

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 (pages 7-8)

- Management action a. Supported.
- Management action b. Supported.
- Management action c. Supported. For conservation, not for extraction or harvesting.

Strategy 2: Review and potentially revise lawful sandalwood take quantities to maintain productive capacity of sandalwood populations and associated ecosystems (pages 8-9)

- Management actions a-b. **Not supported.** UBC strongly calls for an immediate halt to all wild extraction and harvesting – thus these actions would not be required.

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

Strategy 3: Limit the impact of pests, feral animals and diseases on sandalwood (pages 9-11).

- Management actions a-c. All three (3) management actions have included the word ‘may’. This is not adequate for a Biodiversity Management Plan. These threats must be controlled.

Strategy 4: Establish sandalwood in locations not grazed by domestic ungulates (page 11)

- This heading did not convey the contents adequately.
- If as acknowledged, *“Sheep and goat grazing on seedlings and young plants and has had a major impact on establishment and recruitment of sandalwood for many decades”* – an action should be to continue reducing the carrying capacity on pastoral properties and to control feral goats.

Strategy 5: Provide effective compliance and enforcement to combat sandalwood trafficking across the supply chain from the point of origin (pages 12-13)

- Management action a. *“if resources permit”* is not adequate. Government resources must be supplied for this action.
- Management action b. Status quo *“will continue”* has been shown not to be adequate in halting *“Sandalwood trafficking (unlawful take, illegal harvesting, theft, poaching, smuggling) betrays ecologically sustainable use and is a direct threat to the species”*. The State Government must provide adequate and ongoing, dedicated budget to DBCA for this on ground monitoring and management work.
- Management action c. *“may be audited”* is not adequate. Replace and implement asap **‘must be audited and acted upon’**.

Strategy 6: Use and respond to fire to mitigate the impact on sandalwood populations (pages 12-13)

- Management action a. As identified in the DBMP *“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”* – **as such they must not be exposed to any prescribed burns.**
- Management action b. UBC strongly calls for a halt to wild extraction and harvesting – thus this action would not be required.

Strategy 7: Adapt sandalwood management to climate change (pages 13-14)

- Management action a. UBC strongly calls for a halt to wild extraction and harvesting – thus this action would not be required. As such this action would be relevant for the improved conservation management of wild populations in habitat.

Strategy 8: Minimise the impact on sandalwood from lawful clearing (pages 14)

- Management action a. Supported
- Management action b. Not supported. UBC strongly calls for a **halt to wild extraction and harvesting**. The inadvertent availability of sandalwood from authorised clearing must be minimised and any plant material remain in the area.

Strategy 9: Protect soil and water quality as fundamentals to sandalwood biodiversity health (page 15)

- Management action a. “*may undertake*” Not supported. Needs to be changed to **DBCA will undertake both regular and opportunistic monitoring of compliance** with licence conditions for soil disturbance limits.
- Management action b. Supported.

Strategy 10: Establish sandalwood seedlings to maintain wild sandalwood populations in the long term (pages 15-16)

- Management action a (i, ii, iii, vi and vii). Supported – from a conservation biodiversity perspective – but not for wild extraction or harvesting. Plantations are supported.
- Management action a (iv and v). **Not supported.** UBC strongly calls for a halt to all wild extraction and harvesting.

Strategy 11: Set regional protocols for sandalwood conservation, protection and management (page 18)

- Management action a. **Not supported.** UBC strongly calls for a halt to wild extraction and harvesting.
- Management action b. **Not supported.** UBC strongly calls for a halt to wild extraction and harvesting.

Objective: Inform conservation through research and knowledge acquisition strategies

Strategy 12: Identify knowledge gaps in existing research relevant to sandalwood biodiversity conservation (page 17)

- Management action a. Supported. DBCA can start immediately with the Richard McLellan’s PhD work and associated peer-reviewed publications as well as the scientific documentation that led to the IUCN listing *Santalum spicatum* as VULNERABLE.
- Management action b. Supported for biodiversity conservation management only – not for extraction.
- Management action c. Supported for biodiversity conservation management only – not for extraction.

Strategy 13: Quantify and improve sandalwood inventory and population condition monitoring (pages 17-18)

- Management actions a-d. Not supported. UBC strongly calls for a halt to wild extraction and harvesting.

Objective: Engage, implement and review the Programme.

Strategy 14: Provide opportunity for stakeholder and public engagement and participation (page 19)

- Management actions a-b. Not supported unless DBCA is prepared to move further along the ‘Spectrum of Public Participation’ (refer Attachment https://iap2.org.au/wp-content/uploads/2020/01/2018_IAP2_Spectrum.pdf) to INVOLVE, COLLABORATE and EMPOWER, such that community, scientists and Traditional Owners can be confident that their knowledge,

experience and input is not just ‘considered’ but “directly reflected in the alternatives developed and provide feedback on how public input influenced the decision”, “advice and recommendations incorporated into the decisions to the maximum extent possible” thru to “implementing what these contributors collaboratively decide with DBCA”.

Strategy 15: Define agency responsibilities in implementing the Programme (page 19)

- Management action a. Not supported. DBCA must identify measures and targets for management actions. In addition, UBC strongly calls for a halt to wild extraction and harvesting and thus actions around licences will no longer be relevant/required.

Strategy 16: Prescribe the review process and timeframe (page 19)

- Management action a. Supported.

We welcome the opportunity to further elaborate on any of these points.

Regards,

Vice Chairperson
Urban Bushland Council WA Inc

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**ATTACHMENT: International Association of Public Participation (IAP2)
SPECTRUM OF PUBLIC PARTICIPATION**

SOURCE: https://iap2.org.au/wp-content/uploads/2020/01/2018_IAP2_Spectrum.pdf

IAP2 Spectrum of Public Participation



IAP2's Spectrum of Public Participation was designed to assist with the selection of the level of participation that defines the public's role in any public participation process. The Spectrum is used internationally, and it is found in public participation plans around the world.

INCREASING IMPACT ON THE DECISION					
	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

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