



19 October 2012

Attention: Mr Mark Warner, Committee Clerk, Standing Committee on Environment and Public Affairs,  
Legislative Council, Parliament House, Perth WA 6000 (fax 9222 7805).  
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**Submission to: STANDING COMMITTEE ON ENVIRONMENT AND PUBLIC AFFAIRS**  
**Inquiry into the Sandalwood Industry in Western Australia**

## **Summary of the Wilderness Society (TWS) position and concerns regarding sandalwood**

1. TWS fully supports the sustainable development of a farm-based sandalwood industry on previously cleared farmland across the SW agricultural region;
2. TWS strongly opposes the continued unsustainable pulling of mature sandalwood from the wild, i.e. pastoral leases and other public ('Crown') land throughout the rangelands;
3. TWS is concerned about the complicated regulatory framework for the exploitation and management of sandalwood including the potential for conflicts of interest, interagency competition and confusion, unclear responsibilities and the lack of clear, transparent and enforceable requirements for ecologically sustainable exploitation and adequate regeneration.

## **Response to specific terms of reference**

### **a) the regulation and management of the harvesting of wild sandalwood;**

The Wilderness Society (WA) Inc. has long held concerns regarding the regulation and management of wild sandalwood exploitation in WA. In summary, we are gravely concerned that current sandalwood regulation allows government agencies and leaseholders to over-exploit sandalwood and not ensure its adequate regeneration. There is clearly an economic incentive for the cash-strapped Forest Products Commission and leaseholders to allow excessive quantities of mature sandalwood to be removed from public ('Crown') land and there appears to be no clear, binding and enforceable requirement for the FPC or other parties to guarantee the full regeneration of the species. This is further complicated by the government allowing pastoralists to run large commercial goat herds on their leases, further undermining sandalwood regeneration efforts.

Furthermore, to the extent that, as outlined in the following Ministerial media release, native wildlife species that are killed by foxes and cats are an important part of sandalwood ecology, the widespread government-promoted killing of dingoes is a potential problem as dingoes have been shown to be important for reducing fox and cat numbers.

***MEDIA RELEASE 15 March 2006 Hon. Kim Chance***  
***Asian sandalwood buyers drawn to world leader Western Australia***

***The Minister said that the regeneration of native sandalwood stands had slowed in recent decades, with feral cats and foxes decimating the numbers of small marsupials, such as the woylie, which feed on sandalwood nuts.***

*“The woylies would scatter-hoard the nuts like squirrels, burying them and then forgetting about them, so that the seeds germinated and the trees regenerated naturally.*

*“With these marsupials now in danger of extinction, FPC researchers have taken to mimicking the actions of the woylie, with harvesting contractors **being asked**<sup>1</sup> [emphasis added – TWS] to plant a minimum of 12 fresh seeds for each sandalwood tree they harvest,” Mr Chance said.*

*The Minister added that FPC had also adopted a successful technique for preventing feral goats from feeding on sandalwood trees on pastoral leases, by supplying pastoralists with Total Grazing Management kits to trap the animals.*

*“Once the goats are trapped, they are loaded onto trucks and exported,” Mr Chance said.*

In addition to inadequate, largely voluntary and unenforced/unenforceable rules regarding the level of exploitation and regeneration, we have concerns about the management of sandalwood contractors and the damage they can cause in accessing and extracting sandalwood from public lands, including removal of or damage to cultural sites and artefacts, and killing, or capture for sale, of native wildlife.

### **b) the environmental sustainability of wild sandalwood;**

The Wilderness Society is unaware of any systematic, independent, science-based assessment of current wild sandalwood status and trends, including distribution, age structure and regeneration, in light of such cumulative impact factors as:

- 100+ years of over-exploitation;
- grazing pressure and other damage from introduced species (e.g. goats);
- climate change;
- frequent large scale burning and
- decline of native dispersal agents.

This work should be done comprehensively and published before any further supply contracts are considered.

### **c) any other relevant matters.**

- WA is long past the time when we should be commercially exploiting native species from the wild. We have extensive areas of sandalwood crops in the south and north of the state (~20,000 hectares) and this should be the only source of sandalwood.
- Pastoral leaseholders wanting an additional source of income (from native sandalwood) should be required to establish sandalwood crops on already degraded areas.
- International buyers should not be misled by government agencies or marketing companies into believing that the exploitation of WA's wild sandalwood is sustainable.

Yours faithfully  
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<sup>1</sup> NOTE from the Wescorp Sandalwood Pty Ltd website: “FPC manages the sustainable harvesting of the *spicatum* with licensed harvesting contractors that are allocated regions and quotas per annum. For each green sandalwood tree harvested the contractor must plant at least 12 seeds near suitable hosts.”  
<http://www.wescorp.com.au/sandalwood.htm> There appears to be no requirement that any of the 12 seeds is proved to have germinated and be growing successfully to maturity.